

EXHIBIT 16

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OUR CODE OF BUSINESS CONDUCT

VERIZON

our core

... bringing the benefits
of our capabilities to
everyone

our core

Veritas Values

integrity

respect

SERVICE

innovation

passion

Horizon Values

our core

We will create
the most respected brand
in communications

our

We will be
a successful company
when we make and keep
our promises to:

- ... our customers
- ... our communities
- ... our shareholders
- ... and our employees

A Message to All Employees

Our goal is to make Verizon the most respected brand in the industry. This code of business conduct, *Connecting through Integrity*, is your guide for helping us achieve this goal by conducting Verizon business with integrity and respect. Each of us is responsible for upholding the company's commitment to the highest standards of business conduct.

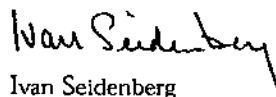
Because the code cannot address every situation and issues continue to evolve in our rapidly changing environment, you can seek assistance, discuss concerns or report violations through numerous channels, including your manager or the Office of Ethics and Business Compliance.

All of us are responsible for abiding by Verizon's standards and raising awareness of problems that may undermine our company's integrity. You are accountable for familiarizing yourself with this code and keeping it handy for your ongoing reference. This code is a tool to help us support The Verizon Promise and a guidepost for our daily decisions and actions.

Our success depends on our ability to *connect through integrity* with each other, our customers and our many business partners.



Chuck Lee
Chairman & co-CEO



Ivan Seidenberg
President & co-CEO

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NOTICE

This code of business conduct is not an employment contract in any form, although adherence to these standards is a condition of employment. This code does not give you rights of any kind, and may be changed by the company at any time without notice. United States employees and U.S. International Assignees of Verizon and its subsidiaries must understand that there is no fixed duration and there are no fixed terms or conditions to the employment relationship. Employees can terminate their employment whenever they wish and for whatever reason they might have with or without notice, just as Verizon or its subsidiaries can terminate their employment or change the terms and conditions of their employment at any time and for any reason or no reason, with or without cause, and with or without notice, unless the employment is covered by a collective bargaining agreement. This is known as employment-at-will. This at-will employment relationship may not be modified except in a written agreement signed by the employee and an authorized representative of the Verizon company that employs the employee, and with concurrence from the company's Legal Department.

Notice

Introduction

This code of business conduct is your resource to help you make sound decisions in doing your job. All of us have a responsibility to establish and maintain business relationships based on integrity with each other and our business partners.* This code can help us build and strengthen these connections.

Read: the code and give careful attention to those subjects that most pertain to your job duties.

Understand: the purpose of this code of business conduct and your overall responsibilities for Verizon's standards of business conduct.

Consult: the following sections:

- **Resolving Ethics Questions** when you need to address ethics and compliance questions.
- **Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct** when you know about or suspect potential or actual misconduct.

Note the Following:

Applicability

Verizon's expectations for responsible conduct are applicable to all parties who work on behalf of Verizon, including, but not limited to, its employees, consultants, in-house contractors, and employees of subsidiaries, controlled affiliates, or representatives. Standards listed in this code are specifically directed at employees, though all other parties should conform to the spirit of these standards.

International Standards

Where local country laws pertaining to employment of local nationals contain mandatory requirements that differ from the provisions of this code of business conduct, such requirements prevail for employees working in those countries.

See Also: Connecting Internationally, p. 57

Limitations

This code of business conduct does not address every expectation or condition regarding proper and ethical business conduct. It does not substitute for company policies and procedures.

Use of "Verizon"

Throughout this code, "Verizon" refers to all subsidiaries and affiliates of Verizon Communications Inc., except Verizon Wireless (which has its own code).

Employment by Verizon Subsidiaries

Verizon and its subsidiaries have adopted this code of business conduct to ensure compliance with applicable legal and ethical requirements. Verizon does not supervise or control the employment terms and conditions of its subsidiaries' employees. Verizon subsidiaries determine their own labor relations, employment and other human resources policies on matters not covered by this code of business conduct.

*This code throughout uses the term "business partner" to refer to parties with whom Verizon has potential or ongoing business relationships. These may include, but are not limited to, current or potential customers, suppliers, joint venture partners, competitors, regulators and government officials.

Our Individual Responsibilities

Individually, we* are a critical connection between Verizon and our business partners. As Verizon employees, we will conduct ourselves with integrity. This can be accomplished by meeting our responsibilities and the standards in this code.

As individuals, we will:

- Help Verizon meet its commitments to stakeholders.
- Help safeguard Verizon's reputation for integrity in our business dealings.
- Conduct our business activities in support of The Verizon Promise.
- Be respectful, cooperative and helpful toward each other and our business partners, never acting in an abusive, obscene or disrespectful manner.
- Not disparage or misrepresent the corporation or any Verizon employee.
- Take responsibility for our personal actions, honestly accounting for and reporting our activities.
- Know and comply with Verizon's code of business conduct, policies and procedures and applicable laws and regulations and how they apply to our work responsibilities.
- Seek assistance when we have questions about Verizon's code of business conduct or when faced with a challenging ethical situation.

See Also: Resolving Ethics Questions, p. 4

- Raise any concerns or report potential or actual violations of Verizon's code of business conduct, as well as any policies and procedures Verizon may issue, or any laws and regulations.

See Also: Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct, p. 5

- Fully cooperate with any Verizon investigation.
- Never act unethically, even if directed to do so by another person. We can never justify any unethical action by claiming we were instructed to do so.
- Never ask or require another person to act unethically or violate the company's code of business conduct or the law.
- Retain a copy of Verizon's code of business conduct for easy reference.
- Attend all required ethics and compliance education and training programs.
- Follow acknowledgement/certification procedures indicating our responsibility to comply with Verizon's code of business conduct.
- Address any apparent conflict between Verizon's code of business conduct, policies and procedures, or applicable laws and regulations.

See Also: Resolving Ethics Questions, p. 4

- Follow business unit policies when they are more stringent than Verizon's code of business conduct.
- If contacted for external legal, government, or media-related requests for information, consult with the Legal or Public Affairs & Communications departments prior to providing any assistance.

*While the use of "we" in this code refers to our common obligation to uphold Verizon's standards of business conduct, each of us is individually responsible for adhering to these standards.

Additional Responsibilities for Management Employees

In addition to **Our Individual Responsibilities**, we will also meet responsibilities related to our leadership role in the business.

As management employees, we will:

- Ensure that all employees meet the company's ethics and compliance objectives.
- Consistently communicate and reinforce Verizon's code of business conduct and related policies and procedures to employees.
- Foster a work environment that encourages employees to act ethically and in compliance with Verizon's code of business conduct.
- Ensure that we maintain open communication and discussion with employees, encouraging them to ask questions and raise difficult issues.
- Provide employees with information and advice regarding ethics and compliance matters.

See Also: Resolving Ethics Questions: Consult Your Manager to Help You, p. 4

- Appropriately address our own or employees' ethics and compliance concerns or reports of potential or actual misconduct in a timely manner and seek guidance as needed.

See Also: Corrective Action and Discipline, p. 7

- Follow company guidelines for appropriate discipline regarding ethics or compliance violations.

*See Also: Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct, p. 5
Corrective Action and Discipline, p. 7*

- Properly delegate authority only to responsible employees.
- Demonstrate leadership by acting with respect and integrity.

Resolving Ethics Questions

Resolving ethics questions helps us strengthen our connections with our business partners and each other. Sometimes we may encounter ethics questions that do not have easy answers and may require difficult judgment calls. We have many resources available to help us resolve ethics questions, starting with this code of business conduct. Often, the following steps can help us resolve these questions:

Define the Situation

- Are you concerned about a possible violation of a law, regulation or Verizon standard?
- Do you need guidance or clarification regarding Verizon standards or other ethics matters?

Consult Resources

- The Verizon Promise (*see inside front cover*).
- *Connecting through Integrity: Our Code of Business Conduct*.
- Corporate and department policies and procedures.

Seek Help from Others

Consult Your Manager* to Help You:

- Think through your question.
- Identify relevant information resources.
- Determine your specific responsibilities regarding resolving your question.
- Raise the question with others who can also help address it.

Consult Another Manager

Address your question with another manager if your manager is not available or you are uncomfortable discussing it with your manager.

Consult a Specific Department

Another organization like Human Resources, Legal, Verizon Security or the Office of Ethics and Business Compliance may be able to assist you.

Call the VZ Ethics Line

The VZ Ethics Line is available 24 hours a day, seven days a week. **The telephone number is (800) 856-1885, or (800) 968-4586 TTY.** (Outside the U.S., dial the AT&T U.S.A. direct access number for the country you are in, then dial the VZ Ethics Line 800 number.) You can provide information related to your question, and a case manager will then contact you to discuss the matter. You can call the VZ Ethics Line anonymously if you wish.

See Also: Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct, p. 5

NOTE

If represented by a union, you should contact your union representative regarding issues covered by a collective bargaining agreement.

*Throughout this document, the term "manager" refers to the person to whom an employee reports.

Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct

Each of us is responsible for reporting concerns and potential or actual misconduct (our own or someone else's) that could violate the company's code of business conduct or any laws or regulations.

Reporting Channels

We will report a concern or suspected misconduct as follows:

Illegal, Dishonest or Harmful Acts Against Verizon

- Verizon Security, (800) 997-3287.
- Our manager or another manager (who is then responsible for reporting the matter to Verizon Security).

Discrimination or Sexual Harassment Issues

- Our manager or another manager, where appropriate.
- VZ EEO (at the following numbers):

South Central (AR, CO, KS, LA, NM, OK, TX)	(214) 285-1078
North Central (IA, IL, IN, MI, MN, MO, ND, NE, OH, KY, SD, WI)	(260) 461-2777
Southeast (AL, GA, FL, MS, NC, SC, TN)	(813) 483-2326
West (AK, AZ, CA, HI, ID, MT, NV, OR, UT, WA, WY)	(805) 372-8993
DE, NJ	(973) 649-4710
NY	(212) 395-2545 (212) 395-4339 (212) 395-7092
Potomac (DC, MD, VA, WV)	(301) 236-1424
PA (also Potomac)	(703) 974-5708
New England	(617) 743-4996
International	(914) 644-3827

All Other Concerns or Misconduct

- Our manager or another manager (who is responsible for obtaining guidance, where appropriate, from Human Resources, Verizon Security or the Office of Ethics and Business Compliance).
- A relevant organization (such as Human Resources, Verizon Security or the Office of Ethics and Business Compliance).
- The VZ Ethics Line, (800) 856-1885, or (800) 968-4586 TTY.

See Also: Call the VZ Ethics Line, p. 4

Confidential Reporting

Employees' reports will be kept confidential to the extent permitted by law and the company's ability to address concerns. In certain instances, employees' names may be provided to those persons involved in the investigation or with a "need to know" about the situation.

Anonymous Reporting

Employees can report issues anonymously by calling the VZ Ethics Line or Verizon Security. Anonymous callers should supply detailed information to address their concerns. In some instances, employees' names will be needed for Verizon to properly investigate the matter. Some investigations may not allow for complete anonymity.

*See Also: Call the VZ Ethics Line, p. 4
Suggestions for Reporting, below*

Reporting Suspected Retaliation

If we believe we or others have been retaliated against for reporting suspected misconduct or for providing information as part of an investigation, we should report the matter to the VZ Ethics Line, Verizon Security, or VZ EEO.

Involvement in Misconduct

Reporting a concern or instance of suspected misconduct does not absolve us of responsibility if we participated in or condoned the misconduct. However, our reporting the misconduct may be considered in determining our accountability for the misconduct.

SUGGESTIONS FOR REPORTING

Below are some suggestions for reporting concerns or suspected misconduct to ensure that our report is handled effectively.

Provide facts regarding the action:

- What is the alleged misconduct?
- Who is involved?
- Who is affected? (Know the correct spelling of names)
- When (Date) and where (Location) has it occurred?
- What information or documentation supports these facts?

Investigations of Reports

Verizon is committed to investigating suspected misconduct. We are responsible for providing truthful information regarding an investigation and cooperating fully with the investigation team. Employees must not:

- Interfere with an investigation, such as by providing false or incomplete information, concealing information or asking others not to contribute to an investigation.
- Destroy any information relevant to an investigation or prior to company record retention policies.
- Discuss any matter under investigation with any unauthorized person.

Employees violating these requirements are subject to discipline.

Corrective Action and Discipline

Employees who violate company standards may be disciplined up to and including dismissal, as well as be subject to civil and criminal charges. If misconduct occurs, Verizon is committed to taking prompt and responsive action to correct the situation and discipline responsible individuals.

Management employees may be disciplined if they condone misconduct, do not report misconduct, do not take reasonable measures to detect misconduct, or do not demonstrate the appropriate leadership to ensure compliance. Managers who have supervisory responsibility must use appropriate measures to ensure that disciplinary action for their employees is consistent and appropriate to the situation, and we can consult with our appropriate Human Resources contact for guidance.

Overview of Standards

This overview is intended to help us become familiar with Verizon's standards contained in this code of business conduct – not to provide their specific requirements. We should always refer to the specific details of these standards contained in this code for guidance. In all cases, we are required to comply with applicable laws, regulations and related policies and procedures.

Connecting with Each Other

We will treat others with whom we interact on behalf of the company, our workplace and the environment with respect.

- **Non-Discrimination, Equal Opportunity and Diversity** – We will not discriminate against others as specified in this code of business conduct and will provide equal opportunity in employment and support a workplace that values diversity.
- **Harassment** – We will not engage in any behaviors that are harassing, including sexual harassment or offensive comments or jokes, and will address and/or report any instances.
- **Employee Privacy** – We will respect others' privacy, but recognize that our privacy at work is limited and subject to business needs.
- **Alcohol and Drug Use** – We will abide by Verizon standards that restrict alcohol and drug use, including not working or reporting to work under the influence of alcohol, illegal drugs or controlled substances.
- **Gambling** – We will not engage in gambling, such as sports pools and raffles.
- **Health & Safety** – We will follow healthy and safe business practices at work by recognizing that workplace violence, threat of violence or carrying weapons is not tolerated and using care when handling hazardous substances.
- **Environmental Protection** – We will help protect the environment in our daily jobs, including addressing resource conservation and pollution control.

Connecting without Conflicts of Interests

We will ensure that our personal interests do not conflict or appear to conflict with our Verizon responsibilities.

- **Outside Employment and Activities** – We cannot – with or without compensation – be employed by, consult with, own, perform services for, or aid a company or organization that is a vendor, supplier, contractor, subcontractor or competitor of Verizon's, or in the same lines of business. We will avoid conflicts that may arise in activities such as serving on boards or committees, using job skills and soliciting and collecting funds for non-work purposes.
- **Financial Interests** – We will ensure our financial interests do not create conflicts, including with respect to securities ownership, participation in financial offerings or acceptance of loans.
- **Personal Relationships** – We will ensure our relations with family and friends do not interfere with our business responsibilities, such as conducting business with these parties and inappropriate reporting relationships, and will disclose these relationships when appropriate.

We should always consult the detailed standards contained in this code of business conduct for more specific guidance.

- **Political Activities and Contributions** – We will make certain that our personal political activities or contributions are separate from Verizon and avoid even the appearance that we are acting on Verizon's behalf.
- **Endorsements, Testimonials and Personal Statements** – We will ensure that any endorsements, testimonials, or statements we make for Verizon or ourselves do not conflict with our duty to Verizon.
- **Departing and Former Employees** – We will avoid conflicts when contracting with, rehiring or purchasing from former employees. If we leave Verizon, we will abide by applicable employment terms and conditions.

Connecting with Company Assets

We are responsible for treating all corporate and other assets with respect and care.

- **Company Property** – We will appropriately work with property belonging to Verizon, our business partners and others, including approved personal use of Verizon property, and ensure others do the same.
- **Company Benefits** – We will only use company benefits plans for ourselves and other covered persons, and provide accurate information as required. We will not misrepresent reasons for absence from work.
- **Company Funds** – We will appropriately work with corporate funds, including protecting them and approving related transactions, seeking appropriate reimbursement for and receiving good value in exchange for them.
- **Insider Trading** – We will not trade in any company's securities based on inside information or inappropriately trade these securities if we possess inside information, even if obtained accidentally.
- **Company Information** – We will appropriately work with information belonging to Verizon, our business partners, our competitors or others, especially nonpublic (such as confidential or proprietary) information.
- **Integrity of Records** – We will prepare, protect, correct and approve records so that they are accurate, truthful, complete and meet applicable standards, including records regarding work time and expenses.
- **Company Time** – We will properly use and record company time and ensure others do likewise, including time worked. We will not inappropriately use company time for personal needs.
- **Corporate Identity and Reputation** – We will protect Verizon's identity and reputation, such as through use of its brand name and logo and in external communications.
- **Sabotage and Espionage** – We will safeguard all corporate assets, including computers and networks, from espionage and sabotage and provide access to them only as authorized.
- **Communications and Computer Systems** – We will properly safeguard and work with communications and computer systems and related data to ensure their accuracy, integrity, safety and confidentiality.
- **Affiliate Transactions** – We will ensure that inter-company transactions and related activities, such as time and expense charges and resource sharing, are permitted, properly documented and meet applicable standards.

We should always consult the detailed standards contained in this code of business conduct for more specific guidance.

Connecting with Customers

We want to sustain our customers' confidence in us and demonstrate we are worthy of their trust.

- **Privacy of Customer Information and Communications** – We will properly work with and only provide authorized access to customer information or communications, and respect their privacy in marketing to them.

Connecting with Suppliers

We will show our suppliers that they are valued business partners and build relationships based on integrity and trust.

- **Working with Agents, External Consultants, Contractors and Other Representatives** – We will ensure that our relations with these business partners meet our standards in hiring and working with suppliers.
- **Selecting Suppliers** – We will hire suppliers fairly, ensure they are properly certified, engage in relations without conflict and only make commitments we are prepared to honor.
- **Working with Current Suppliers** – We will only exchange appropriate business courtesies and other considerations with current and potential suppliers. We will treat suppliers' information with care and according to our agreements.

Connecting through Business Courtesies

We will conduct business impartially and with the company's and our business partners' best interests in mind, only exchanging appropriate business courtesies according to acceptable company standards.

- **Gifts** – We will only exchange non-monetary and generally modestly-valued gifts that promote goodwill with our business partners and do not improperly influence others. We will accept only approved and widely available discounts.
- **Entertainment** – We will only exchange appropriate, reasonable and business-related entertainment that is approved and not intended to improperly influence others, and we will reciprocate hospitality as appropriate.
- **Gratuities** – We will never encourage, accept or exchange gratuities or payments for providing specific services.

Connecting Fairly in the Marketplace

We will work and compete fairly with others to maintain a reputation for fairness.

- **Dealing with Competitors, Customers and Suppliers** – We will not engage in activities with customers, suppliers or competitors that unfairly prevent or limit competition, or could appear to do so.
- **Attempts to Monopolize** – We will not engage in independent actions with respect to customers, suppliers or competitors that unfairly restrain trade and/or attempt to improperly gain market share.

We should always consult the detailed standards contained in this code of business conduct for more specific guidance.

- **Competitor Disparagement** – We will not disparage competitors in how we describe our or their companies, activities or events, or products or services.
- **Competitive Information** – We will properly acquire competitive information, without misrepresentation, not allow others to violate their duty to protect it and, if owned by others, use it only as authorized.

Connecting with the U.S. Government (Federal, State and Local)

When interacting with U.S. federal, state and local governments and their representatives, we will conduct ourselves with honesty and integrity, including following the rules related to all government relations.

- **The Government as Customer** – In serving the government, we will abide by all requirements governing our interactions, including use of nonpublic information, and ensure parties acting for us do likewise.
- **Other Government Relations** – We will comply with tariffs and with applicable conditions in doing business with current or former government employees. We will provide required information in legal matters.
- **Business Courtesies (Government Business)** – We will not authorize or exchange business courtesies or other considerations not permitted by government rules or other applicable standards.
- **U.S. Government Classified and National Security Information** – We will properly acquire, use and safeguard sensitive government information and other assets, even if we leave Verizon.

Connecting Internationally

We will conduct business around the world in consideration of both U.S. and local standards and customs and in a way that fosters Verizon's reputation as a good business partner.

- **Import/Export Control** – We will comply, and ensure that applicable parties comply, with relevant import/export standards in transferring Verizon products, services, equipment, information or knowledge.
- **Payments Outside the U.S.** – We will comply with standards regarding making payments to others while conducting business outside the U.S.
- **International Boycotts and Other Economic Sanctions** – We will follow boycott-related standards, including providing information about boycotted countries or other entities.
- **Business Courtesies (International Business)** – We will report gifts we receive, and seek approval before providing gifts, that fall outside of Verizon standards.

We should always consult the detailed standards contained in this code of business conduct for more specific guidance.

Connecting with Each Other

Non-Discrimination, Equal Opportunity and Diversity

Verizon is committed to establishing and maintaining a workplace that promotes diversity and is free from discrimination. Various laws also prohibit certain forms of discrimination. The company benefits by encouraging all employees to value and respect each other and maintain an environment supportive of individual differences, where each of us can participate and contribute free from discrimination. This consideration should also be extended to our business partners.

Non-Discrimination

We will make all employment and other business decisions without discriminating on the basis of age, color, citizenship, disability, disabled veteran status, gender, race, religion, national origin, marital status, sexual orientation, military service or status or Vietnam-era veteran status.

Discrimination should not occur regarding terms and conditions of employment, including, but not limited to: recruitment, hiring, job benefits, compensation, training, performance appraisals, upgrading and promotional opportunities, assignment transfers, leaves of absence, lay-offs, returns from layoffs, providing work-related assistance or information, access to or participation in social and recreational programs, use of company equipment or facilities, disciplinary action and termination of employment.

See Also: Supplier Selection, p. 42

Customer, Supplier or Competitor Discrimination, p. 51

Equal Opportunity and Diversity Efforts

We will fully support programs that encourage qualified women, minorities, disabled individuals, and Vietnam-era veterans or others to seek equal employment opportunities or business relationships with Verizon. We will also fully support other Verizon efforts to achieve a culture where diversity is valued.

Reasonable Accommodations

We will make reasonable accommodations for employees and applicants as provided by law. We should contact the Human Resources Department for more information.

Exclusionary Practices

For company business, we will only use facilities, sponsor events or maintain memberships at businesses or organizations that do not have exclusionary membership practices.

Reporting Discrimination

We will immediately report any instances of discrimination that we know about or witness.

See Also: Reporting Channels, p. 5

Harassment

Verizon is committed to providing a harassment-free work environment. Harassing behavior demeans others, threatens productivity, can adversely affect the company's reputation and may violate the law.

See Also: Employee Assistance Program, p. 15

Use of E-Mail and the Internet, p. 38

Harassment

We must not engage in any behavior that ridicules, belittles, intimidates, threatens or otherwise demeans co-workers or others associated with the company, including contractors, customers, suppliers, employment applicants or other business partners and competitors. Verizon also will not tolerate harassment by any of the parties mentioned above against a Verizon employee. Harassment can include making racist, sexist, or ethnic comments, jokes or gestures or hazing. Verizon prohibits harassment based on a person's race, color, gender, religion, national origin, age, disability, sexual orientation, or any other reason.

Sexual Harassment

We must not engage in unwelcome sexual conduct or make unwelcome sexual overtures to co-workers, business partners or any others identified under **Harassment** previously.

This includes but is not limited to any behavior that:

- Requires or implies that another person's submission to or rejection of sexual advances will affect that person's employment. This can include hiring, job assignment or duties, shifts, compensation, appraisals, promotion or advancement, transfers, training opportunities, disciplinary action, termination, or any other conditions of employment or career development.
- Creates a hostile work environment for another that is sexually abusive, demeaning, intimidating, threatening or offensive. We will not request sexual favors, engage in visual, verbal or physical conduct of a sexual nature, display sexually suggestive objects or pictures, tell offensive jokes, use sexually suggestive language, or send sexually suggestive e-mail.

Reporting and Addressing Harassment

We will immediately report any instances of harassment that we know about or witness. This may include sexual harassment or harassment based on a person's race, color, gender, religion, national origin, age, disability, sexual orientation, or any other reason. We will not retaliate against employees for filing a complaint of alleged harassment or for participating in an investigation of alleged harassment.

In some situations, such as when others tell offensive jokes, we can resolve this matter by speaking with the person and expressing our concerns. If we cannot resolve the matter in this way, or are uncomfortable doing so, we should consult with our manager, another manager, VZ EEO, and/or other relevant departments.

See Also: Reporting Channels, p. 5

Employee Privacy

As employees, we respect each other's privacy and should maintain this trust. At the same time, we recognize that this privacy is limited and subject to business needs.

Handling Employee Information

We will:

- Only gather employee information that is required for effective business operation.
- Only access or use employee information for authorized business purposes.
- Safeguard this information when entrusted to us.
- Disclose employee information only:
 - To authorized personnel.
 - For legitimate reasons.
 - According to Verizon policies or applicable laws.
- Handle external requests for employee information according to company policies regarding employment verification and references.

(continued)

*Employee Privacy (continued)***COMMUNICATIONS MONITORING**

The company may conduct service-quality observations for legitimate business and regulatory purposes (for example, quality control, performance appraisals, training, re-training, manager assistance, or service measurement). Also, all electronic monitoring, video and personal surveillance, record assimilation, retention and release, investigative activities, and property protection conducted by Verizon will be carried out only for legitimate business purposes. All of the above observations will be conducted in full compliance with U.S. federal, state and local laws, collective bargaining agreements and the laws of other countries, when applicable.

**ACCESS TO EMPLOYEE WORK SPACES,
PERSONAL PROPERTY AND COMMUNICATIONS**

Sometimes it is necessary to monitor employee personal communications or computer usage or to search employee workspaces for the protection of employees, company assets and other legitimate business reasons. Verizon retains the right to monitor personal communications or computer usage or to search any and all company property at any time, including, but not limited to, offices, desks, lockers, bags, vehicles, e-mail, voice mail, pagers, Verizon telephone usage records and computer files. This applies also to company property located off-premises for telecommuting purposes, company records and materials located on personal computers, and personal property (such as personal vehicles) on company premises.

See Also: Communications and Computer Systems, p. 36

CONDUCT OFF THE JOB

Conduct off the job is ordinarily the personal business of the employee – unless it conflicts with the employment relationship with Verizon. Off-duty conduct may pose a problem if it threatens Verizon's reputation, adversely affects our job performance or that of our work group, interferes with Verizon's ability to conduct business or is unlawful. Conduct that creates conflicts of interests is also inappropriate. If we have questions concerning conduct outside the workplace, we should consult with our manager or the VZ Ethics Line.

See Also: Harassment, p. 12

Workplace Violence and Weapons, p. 17

Connecting without Conflicts of Interests, p. 19

Personal Use of Company Property, p. 26

Trading Securities, p. 28

Alcohol and Drug Use

Improper use of alcohol or drugs adversely affects our job performance and can risk the health and safety of others and ourselves. We will comply with company standards regarding use of alcohol, drugs and other controlled substances.

Drugs or Controlled Substances

We will not work or report to work under the influence of illegal drugs or controlled substances. We are prohibited from possessing, selling, using, manufacturing, distributing, or offering to others any illegal drugs or controlled substances while on company business or on company premises. This prohibition does not include legally obtained medications or prescriptions used as directed by a medical practitioner.

See Also: Use of Legal Substances, below

Alcohol

We will not work or report to work under the influence of alcohol. We will not consume alcohol at any time when it may impair our ability to do our job, endanger others or ourselves, or reflect adversely on the reputation of the company or any of its employees (including while on company business, prior to work or during meals or breaks or while representing the company, such as at conferences). A department vice president or above must authorize serving alcohol at Verizon functions.

Use with Equipment or a Vehicle

We are prohibited from operating equipment or driving or riding in a company vehicle or a vehicle being used while on company business (including personal vehicles) while under the influence of alcohol, illegal drugs or controlled substances. We are prohibited from possessing alcohol, illegal drugs or controlled substances in company vehicles.

Use of Legal Substances

We will inform our manager when taking any medication that may create a safety risk.

Legal Actions for Drug and Alcohol Offenses

If convicted of a drug or alcohol-related offense relating to our conduct while on company property or business or that otherwise relates to our work responsibilities, we are required to promptly report this conviction to our manager. If our job requires us to have a valid driver's license and our license is suspended or revoked for any reason, we must immediately report this to our manager.

THE EMPLOYEE ASSISTANCE PROGRAM

If you feel you have personal problems that may affect your well-being or job performance, you can contact the Employee Assistance Program (EAP) for help. The EAP can assist you with these issues, including:

- Alcohol or drugs or other addictive behaviors.
- Personal or work relationships.

The EAP provides confidential services to all Verizon employees.

Gambling

Certain activities, such as participating in gambling, not only distract us from our work, they are improper in the workplace and may be unlawful.

We must not gamble on company premises or while conducting company business. We also must not use company resources for gambling, including, but not limited to, using e-mail for office pools or placing bets over the telephone, fax or Internet. Examples of gambling include participating in office football, basketball or other sports pools, 50/50 splits, SuSu's, raffles, lotteries or other games of chance requiring some form of payment in order to be eligible to win.

We cannot conduct or participate in fundraisers that involve any form of gambling on company premises or while conducting company business.

See Also: Employee Assistance Program, p. 15
Outside Employment and Activities, p. 19
Collection of Funds for Non-Work Purposes, p. 21
Communications and Computer Systems: Personal or Unauthorized Use, p. 37
Use of E-Mail and the Internet, p. 38

Health and Safety

The health and safety of all employees, business partners and other visitors are company priorities. Good health and safety practices help us do our jobs without putting others or ourselves at unnecessary risk. As Verizon employees, we are committed to following all appropriate health and safety practices, including related laws, regulations and company policies.

See Also: Environmental Protection, p. 18

Safety**Safety Procedures and Records**

We will complete all required safety training and follow all safety procedures and practices (including those for using tools and equipment) that apply to our work environments. We will use all personal protective equipment and devices required for our work assignments. We will comply with all laws, regulations and company standards that require Verizon to maintain records regarding training, inspections, health and safety injuries, illnesses and motor vehicle accidents.

Vehicle Use

We must follow all laws, regulations and company standards regarding vehicle operation and traffic safety. We must drive company vehicles defensively and wear seat belts. We may operate a vehicle only if we have a valid driver's license for that type of vehicle. When our job requires a license, we must report suspension or loss of the license promptly to our manager.

See Also: Alcohol and Drug Use: Use with Equipment or a Vehicle, p. 15

Hazardous Substances

We must understand the hazards of the materials we use, and we will review the appropriate safety requirements for any materials we are not familiar with. We will properly handle, store, and transport hazardous substances according to company policies and applicable laws. We will not bring any hazardous materials onto the property of Verizon or any business partner except when authorized and with a valid business purpose.

Purchasing

We will consider safety and health implications when making purchasing decisions.

Cooperation with Officials

We will cooperate with government or regulatory health and safety officials in their reviews of company facilities and operations. If approached by anyone requesting such a review, we will immediately contact the Safety, Health and Environment and/or Legal departments for assistance.

Reporting

We will abide by Verizon safety and environmental reporting procedures, including immediately reporting:

- Potential, actual or unresolved unsafe or hazardous conditions to a manager or to the Safety, Health and Environment Department, and
- All on-the-job accidents and illnesses directly to the Safety, Health and Environment Department, according to laws and company policies.

Workplace Violence and Weapons**Threatening or Hostile Behavior**

Verizon will not tolerate any threatening or hostile behavior and will take immediate and appropriate action against offenders, up to and including termination and criminal prosecution. We must not engage in any assaults, hostile physical contact or intimidation, fighting, verbal threats of physical harm or violence, or any other actions that are threatening, hostile or abusive in nature while on company property or on company business. Also, we must not damage, destroy or otherwise harm the property of Verizon, its employees, its business partners, competitors or others.

See Also: Protection and Use of Company Property, p. 26

Weapons

We must not carry weapons (even with a permit or license) on company property, while conducting company business, in company vehicles, or in personal vehicles when on company property or while conducting company business. We must not use any tool, supply or other resource in a manner that implies it is a weapon.

Reporting

We must immediately report to Verizon Security any actual or potentially threatening or hostile behavior that could cause a risk to our own or others' safety or lives.

DOMESTIC VIOLENCE

Domestic violence can adversely affect the safety, health and productivity of employees who are victims, as well as their co-workers. Employees should notify the police and Verizon Security of any such incidents that may affect the safety of our workplace. Verizon's Employee Assistance Program can assist employees involved in domestic violence.

See Also: Employee Assistance Program, p. 15

Environmental Protection

At Verizon we are committed to minimizing the impact of our operations on the environment and to incorporating proactive environmental initiatives into our daily business. Verizon employees will abide by all laws, regulations, and company policies relating to the protection of the environment.

See Also: Health and Safety, p. 16

Resource Conservation

We will be familiar with and participate in corporate programs related to environmental conservation and protection, including waste minimization, material reuse, energy efficiency, and recycling programs.

Hazardous Materials

We will follow all procedures required by laws or company policies for identifying, storing and handling of toxic, hazardous and other regulated materials and wastes. We will notify the Safety, Health and Environment Department if we are unsure of whether a material or waste is regulated or if any regulated material is no longer useful. Only the Safety, Health and Environment Department may dispose of regulated wastes.

Pollution Control

We will use and maintain pollution control systems, including those that are part of any equipment or vehicles that we use. We will comply with the requirements of any environmental permits applicable to any systems or equipment that we use.

Purchasing

We will consider environmental implications when making purchasing decisions.

Regulatory Inspections and Internal Reviews

We will follow the company's policies for addressing environmental inquiries or inspections by government officials. We will immediately notify the Legal and Safety, Health and Environment departments of any inspections or inquiries and will cooperate with relevant government officials. We will also cooperate with any internal reviews of environmental systems or practices.

Reporting

We must comply with the reporting procedures specified by the Safety, Health and Environment Department and report all spills and other potential, actual or unresolved unsafe or hazardous conditions, including conditions that pose a threat to our environment, health or safety.

Connecting without Conflicts of Interests

Our personal or other non-business activities and interests, including our relationships with others, may inappropriately affect our work responsibilities. These conflicts of interests can undermine our business judgment and our responsibility to the company and threaten Verizon's business and reputation. We should avoid conflicts of interests – or even the appearance of such conflicts – to ensure that our actions are in the best interests of the company, its customers, and other business partners.

NOTE

Because issues regarding conflicts of interests can be complex, we should consider the following to help us resolve potential or actual conflicts:

- If we have any doubt, we should treat the situations as actual conflicts until they have been disclosed and resolved.
- Sometimes, we can easily resolve conflicts if we disclose them before taking any action.
- If we do not disclose potential or actual conflicts, they may create situations that cannot be properly resolved.
- We should discuss or disclose any potential or actual conflicts to our manager or the VZ Ethics Line.

Outside Employment and Activities

We may not engage in any activity that competes with Verizon, conflicts or appears to conflict with our employment, compromises Verizon's interests, or adversely affects our job performance.

Outside Employment, Activities or Service

We cannot – with or without compensation – be employed by, consult with, own, perform services for, or aid a company or organization that is a vendor, supplier, contractor, subcontractor or competitor of Verizon's, or in the same lines of business, including, but not limited to, communications, cable, video, entertainment or information management, long-distance, Internet, software or Web design, or any other line of business in which Verizon is engaged or actively seeking to enter. We may not sell a product or perform a service in competition with Verizon, including through self-employment.

Outside employment, activities or service may not interfere with our work at Verizon (for example, it cannot be an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, refusal to work overtime or different hours).

Outside Use of Job Skills

We cannot perform services similar to what we do for Verizon outside of the company – whether or not we receive any compensation for it – if Verizon provides that same or a related service in the marketplace.

Personal Use of Company Resources

We will not use company resources (for example, property, time, funds, information, records, intellectual property or nonpublic information, computer software or systems, corporate name) for non-Verizon activities without our manager's approval.

*See Also: Personal Use of Company Property, p. 26
Company Information, p. 28*

Outside Non-Employment Activities

If we are associated with an outside organization, we will remove ourselves from discussing or voting on any matter that involves the interests of Verizon or its competitors. We will disclose any conflict to the organization without disclosing Company Information.

(continued)

*Outside Employment and Activities (continued)***Board or Committee Membership**

To ensure that our roles with Verizon and an outside organization do not conflict, we will obtain approval:

- From our director-level or above manager prior to serving on a board or committee of an outside organization that may present a conflict or appearance of a conflict with Verizon's business interests.
- From both our manager and the business unit's highest level senior officer prior to:
 - Serving on a board or committee of a corporation that is required to file a report with the Securities and Exchange Commission.
 - Acting as a representative of Verizon on a board or committee of any outside organization.

Doing Business with Other Companies

When we are in a position to recommend or participate in the decision that Verizon do business with a company in which we (or our family or household members, or people with whom we have a close, personal relationship) have business, employment or financial involvement, we will disclose the relationship and obtain approval from our manager. Factors to be considered in granting approval may include the following:

- The relationship is disclosed in advance,
- No reasonable likelihood exists that the relationship improperly influences the decision to do business with this company, and
- Verizon otherwise would have valid business reasons to do business with the company if the relationship did not exist.

Personal Solicitation for Outside Activities*

Personal solicitation for charitable, community, educational or other activities and causes can interfere with business operations and be perceived as coercive. Inappropriate personal solicitation generally includes political or religious activities or causes or any gambling/games of chance. Employees may not use company work areas or company time to solicit other employees or distribute any non-work related literature. In addition, solicitations also may not involve company mail or communications systems, such as e-mail or electronic bulletin boards. With approval by local management, employees may distribute literature in non-work areas during non-working time, provided it meets company standards.

Non-employees may not engage in any type of solicitation, distribution or similar activities on company premises without proper approval.

See Also: Gambling, p. 16
Collection of Funds for Non-Work Purposes, p. 21

* In the event of any conflict between these standards and an applicable collective bargaining agreement, the applicable collective bargaining agreement will prevail. Management should consult with Labor Relations for further information.

COLLECTION OF FUNDS FOR NON-WORK PURPOSES

Verizon is not responsible for the collection or storage of funds on company premises for personal or other non-work purposes. Examples include "sunshine funds" or birthday recognitions.

*See Also: Gambling, p. 16
Personal Solicitation for Outside Activities, p. 20
Use of Others' Property, p. 26*

QUESTION

Why do I need to seek approval from my director-level or above manager regarding my potential service with an outside organization?

ANSWER

Verizon supports employees who engage in outside activities but wants to ensure that there is no potential for a conflict of interests between the company's interests, your Verizon job responsibilities and your service with the outside organization. For example, serving on your condominium or local school board may be appropriate except when decisions related to telecommunications issues arise.

Financial Interests**Financial Interests in Business Partners**

We will not invest nor maintain ownership or other financial interest in a competitor, supplier or joint venture partner of Verizon if that interest could be considered a significant financial interest. A significant financial interest could possibly cause us to make decisions that are not in Verizon's best interests and create an actual or perceived conflict of interests. The impact of a financial interest on our decision making may vary depending on our position with the company.

WHAT IS A SIGNIFICANT FINANCIAL INTEREST?

A significant financial interest is any financial interest that:

- Is more than 1/10 of 1% of a company's publicly traded securities or other financial instruments, and
- Exceeds 25% of an employee's Verizon annual cash compensation.

We should consult the VZ Ethics Line with any questions.

Preferential Securities Ownership

We will not accept opportunities to participate in financial transactions involving the stock or other securities of business partners or prospective business partners, such as participating in "friends and family" deals or initial public offerings (IPOs), if these opportunities may improperly influence or appear to influence our business judgment on behalf of Verizon.

Transactions Related to Company Securities

We will not engage in any financial transaction in which we may benefit from the devaluation of our company's stocks, bonds or other securities, including, but not limited to, short selling or buying "put" options on Verizon stock.

(continued)

*Financial Interests (continued)***Loans**

We will not offer or accept personal loans or other guarantees (for example, loan preferences/discounts not offered widely) to or from suppliers or competitors of Verizon.

See Also: Doing Business with Other Companies, p. 20

Personal Relationships

Our relationships with family and friends can sometimes interfere with our business responsibilities, especially if there is a perception of favoritism. We should always take care that such relationships do not inappropriately impact our work responsibilities or our ability to make sound, impartial and objective decisions.

Reporting Relationships and Influencing Employment Conditions

We will avoid inappropriate reporting relationships where our objectivity may be or seem to be compromised and will not directly or indirectly supervise nor report to persons with whom we have:

- A family relationship, including, but not limited to, members of our immediate and extended family. (Our immediate or extended family includes, but is not limited to, one's spouse, parents, brothers, sisters, children, grandparents, grandchildren, cousins, in-laws, aunts, uncles, nieces, nephews or any similar half or step-relationship.)
- A household relationship.
- A close, personal relationship.

Also, we will reasonably separate those with whom we have a family, household or a close, personal relationship from our influence in job assignment, performance evaluations, promotions, compensation decisions and hiring practices.

These same restrictions apply to reporting relationships with contractors, vendors, suppliers, external consultants, and other business partners.

If any of these situations develop, we will disclose the existence of the relationship to our manager so that the situation can be resolved.

Business with Related Parties

We will disclose to and obtain approval from our manager if:

- A family or household member or someone with whom we have a close, personal relationship works for a customer, supplier, or competitor and is in a position to influence decisions affecting Verizon.
- We are or could be directly or indirectly involved in any Verizon business transaction with a family or household member or someone with whom we have a close, personal relationship.

Factors to be considered in granting approval may include the following:

- The relationship is disclosed in advance,
- No reasonable likelihood exists that the relationship improperly influences the decision to do business with this company, and
- Verizon otherwise would have valid business reasons to do business with the company if the relationship did not exist.

See Also: Doing Business with Other Companies, p. 20

QUESTION

My brother is a computer consultant whom I consider highly qualified for an upcoming Verizon project I will be staffing. Can I retain his services or even recommend him?

ANSWER

No, not for your project. Although he may be qualified, hiring or even recommending him would create the appearance of a conflict of interests. Your brother is not precluded from consulting for Verizon, but you may never supervise him or be involved in the decision to hire him as an employee or vendor.

QUESTION

I am a marketing director at Verizon. A good friend of mine, a service representative in another director's organization, recently applied for and received a transfer into my organization. Does this present a conflict?

ANSWER

Yes. This situation would create an inappropriate reporting relationship since your friend would report "indirectly" to you by reporting to a supervisor who either reports to you, or whose manager reports to you. You would have influence and decision-making authority over your friend's job assignment, performance evaluations, compensation and other employment matters that would result in the appearance of nepotism or favoritism.

Political Activities and Contributions

Verizon is actively involved in the political process and understands that employees may also support government issues and political activities, such as volunteering and contributing to political causes. Laws both inside and outside the U.S. regulate these activities and impose penalties for noncompliance. Verizon has specific standards for political activities and contributions to avoid improper activities or practices that are not in Verizon's best interests.

Personal Political Interests

Our personal political contributions and activities should be separate from the company and avoid even the appearance that we are acting on behalf of Verizon. We will:

- Not use company assets for any personal political contributions or activities that are inconsistent with legal regulations. We should contact the Legal Department with any questions.
- Not make personal political contributions on behalf of the company.
- Ensure that any personal political testimonials, endorsements, other statements or lobbying activities do not reference our employment with the company or imply its support for our position.

See Also: Endorsements, Testimonials and Personal Statements, p. 24

Employee Lobbying

Unless we are specifically authorized to lobby on behalf of the company, we must avoid even the appearance of lobbying. When appearing before a government body or having contact with a public official and we are doing so outside of ordinary work duties, we should make it clear that we are not representing Verizon.

For more information, we should contact the Government Affairs Department.

(continued)

*Political Activities and Contributions (continued)***Contributions of Corporate Assets**

We are permitted to make payments of corporate contributions, whether monetary or non-monetary assets, to any political party, candidate, campaign or public official inside or outside the U.S. only if allowed under applicable laws and approved in advance by the Verizon Legal Department. If our duties involve distributing corporate funds to support candidates or political parties, we will comply with laws and regulations both inside and outside the U.S. governing these activities.

Seeking Public Office

Before we seek any elected or appointed political office, we will discuss this matter with our manager to ensure no potential conflict of interests exists.

See Also: Outside Non-Employment Activities, p. 19

POLITICAL ACTION COMMITTEES

Verizon and its subsidiaries administer Political Action Committees (PACs) that accept contributions from employees who wish to support the political process in a way that identifies with Verizon and as permitted by law. Our personal contributions to these PACs are entirely voluntary.

Endorsements, Testimonials and Personal Statements

Suppliers, vendors, trade and professional organizations and others may seek endorsements or testimonials from us either as Verizon employees or as private individuals. We should ensure that our actions are in Verizon's best interests.

Company Endorsements and Testimonials

We will not give an endorsement or testimonial on behalf of Verizon without specific prior approval of the Public Affairs and Communications Department and, if warranted, the Legal Department, whether or not any payment or consideration is offered in return. This includes requests to use Verizon's name in any external or internal vendor company announcement. When seeking approval, we will disclose whether we have been offered or anticipate being offered any consideration. In certain instances, our manager or the Legal Department can require that we decline the consideration.

See Also: Use of Brand and Logo, p. 34

Personal Communications

When providing personal endorsements, testimonials, statements or written material unrelated to our work at Verizon, we will not use our affiliation with Verizon in any way without specific approval from the Public Affairs and Communications Department and, if warranted, the Legal Department. We will also inform any relevant party that they should not refer to our affiliation with Verizon without approval.

Departing and Former Employees

Business relations with former employees can inadvertently harm Verizon and present a perception of favoritism. As a result, we will ensure that our dealings with former employees and our actions, should we leave Verizon, comply with related company standards.

Departing Employees

Our obligation to abide by certain company standards exists even after our employment ends. We will not accept a job with another company if our duties would cause us to:

- Breach any employment condition or agreement we have with Verizon.
- Use or disclose Verizon nonpublic information in the new position.

See Also: Nonpublic (Confidential or Proprietary) Company Information, p. 29

Former Employees

See Also: Employee Separation, p. 31

Company Information

Unless authorized, we will not provide any Verizon nonpublic Company Information to former employees.

See Also: Nonpublic (Confidential or Proprietary) Company Information, p. 29

Contracting or Rehiring Former Employees

In general, we will only rehire or contract with a former employee who has been separated from the company for a minimum time period established by Human Resources.

Purchasing from Former Employees

We will not make purchases on behalf of Verizon from former employees who market or sell either their own or another company's products and services unless they have been separated from the company for more than a year and we have appropriate authorization and follow Verizon procurement policies. Certain former employees may have information from which they can still unfairly benefit even after a year. In such cases, we will consult with Corporate Sourcing for appropriate action. Exceptions may be made only with approval from a department vice president.

Connecting with Company Assets

NOTE

Issues about company assets can be complex, especially regarding **Insider Trading, Company Information** and **Communications and Computer Systems**. We should consult with the Legal Department when we need clarification regarding related laws and regulations.

Company Property

Our shareholders trust us to manage company assets appropriately. We will ensure that company equipment, supplies, and other assets are used for legitimate business purposes unless otherwise specifically authorized, and that we protect all tangible and intangible company property.

WHAT IS COMPANY PROPERTY?

Property includes, but is not limited to, equipment, supplies, real estate, tools, inventory, funds, computer systems and equipment, computer software, computer data, vehicles, records or reports, nonpublic information, intellectual property or other sensitive information and materials, and telephone, voice mail or e-mail communications.

Protection and Use of Company Property

We will protect company property from potential theft, misuse, loss, damage or sabotage and follow company policies designed for its protection. We will not take, use, sell, borrow, loan, give away, intentionally damage, sabotage, destroy or otherwise dispose of company property, regardless of condition or value, without appropriate authorization.

Use of Others' Property

We will treat the property belonging to customers, suppliers, joint venture partners, and all other business partners and competitors appropriately, using it only for business purposes and as authorized, according to any legal standards, agreements or contractual provisions. In addition, we will not use or take co-workers' funds or other property without their knowledge and approval.

Personal Use of Company Property

Company property is intended to be used for business purposes. However, limited personal use may be permissible when authorized by our manager and it does not:

- Interfere with our work responsibilities or business operations.
- Involve interests in personal outside business and/or other non-authorized organizations and activities (which may include soliciting or promoting personal commercial ventures and political or religious causes).
- Lead to inappropriate costs to the company.
- Violate the standards contained in this code, or any other Verizon policies and procedures, including the prohibitions and restrictions on the use of Company Information.

*See Also: Communications and Computer Systems: Personal or Unauthorized Use, p. 37
Company Information, p. 28*

Company Benefits

Verizon's benefits plans and programs (including, but not limited to, insurance, pension and retirement, and medical plans) are provided to us as compensation and we must use these benefits honestly. We will only use employee and related benefits for ourselves and other persons legitimately covered by benefit plans. We will provide complete and accurate information about covered members and ourselves as required for employee-related benefits plans. We will not misrepresent our health status or other reasons for absence (for example, misrepresenting one's health condition or receiving disability benefits while working on another job).

Company Funds

How we treat company funds has a direct impact on Verizon's overall financial success. We will handle company funds responsibly.

See Also: Maintaining and/or Approving Records, p. 33

WHAT ARE COMPANY FUNDS?

Company funds are any monies, documents or records that have or represent financial value. Company funds include, but are not limited to, currency, checks, vouchers, credit or charge cards, receivables, payables, money orders, postage, bills, benefits enrollment forms, reimbursement claims, estimates, paychecks, expense reimbursements and invoices.

See Also: Collection of Funds for Non-Work Purposes, p. 21

Protection, Use and Recording of Funds

We will:

- Protect all company funds, especially those funds entrusted to us.
- Abide by company policies for the security of company funds.
- Ensure that the company receives good value in exchange for company funds or personal funds that will be reimbursed by the company.
- Only seek reimbursement for expenses that are reasonable, actual and authorized.
- Accurately, honestly and timely prepare records of funds and related transactions.
- Ensure records that we approve reflect appropriate use of company funds and are accurate, honest and prepared timely.

Personal/Unauthorized Use of Funds

We will not use company funds for personal use or for corporate business that is not approved.

Use of Corporate Credit Card

We will use our corporate credit card only for authorized Verizon business.

(continued)

*Company Funds (continued)***QUESTION**

Can I use my corporate credit card for personal charges?

ANSWER

No. Verizon credit cards are for business purposes only and must not be used in any circumstances for personal charges.

Insider Trading

Inappropriately trading or passing on information about sensitive Verizon or business partner activities or opportunities can harm these partners and Verizon's corporate strategy, depriving us of valuable opportunities to improve our services to customers. In addition, trading on the basis of inside information, or passing inside information on to others who may trade (even if we receive no financial benefit), is a crime and can result in significant fines or imprisonment.

See Also: What is Company Information?, p. 29

NOTE

We should understand that the securities trading of our family members, household members or those with whom we have a close, personal relationship can, under some circumstances, result in legal liability for us and can suggest or lead to a conflict of interests between the company and us.

Trading Securities

We will not trade in Verizon's or any other company's securities, including derivatives of these securities (such as call and put options), on the basis of inside information, even if obtained accidentally or unintentionally. We will check with the Legal Department if we intend to buy or sell Verizon stock, the stock of any other company, or related derivative instruments when we may have inside information.

Company Information

(Including Confidential and Proprietary Information)

Information that we use in our business is a vital Verizon asset – providing us with opportunities in better serving our customers and competing in the marketplace. Customers, employees and other business partners trust us to use their information with care. We will carefully handle both Verizon information and information that others entrust to us.

WHAT IS COMPANY INFORMATION?

Company Information consists of:

- Verizon-owned nonpublic information (Confidential or Proprietary Information).
- Our employees', customers', and other business partners' nonpublic information entrusted to us.
- Publicly available information in which Verizon or others have intellectual property rights, the use of which is subject to the applicable intellectual property restrictions.

Nonpublic Company Information includes:

- **Inside Information** – Information belonging to Verizon or others that is not publicly available and that, if it became known, could reasonably lead a person to buy, sell or hold Verizon's or another company's securities.
- **Other Nonpublic Information** – Information belonging to Verizon or others that, for business purposes, the owner does not want made public (for example, routine correspondence, materials from mass company presentations, internal company directories), or that provides the owner with a business advantage.

Nonpublic (Confidential or Proprietary) Company Information

This includes any nonpublic information owned by Verizon or entrusted to Verizon by its employees, customers or other business partners. Nonpublic Company Information also includes inside information and trade secrets, which are sometimes referred to as "confidential" or "proprietary" information.

Protecting Nonpublic Company Information

We will safeguard nonpublic Company Information in the possession of Verizon by:

- Following company policies and procedures for identifying, using, protecting and disclosing this information.
- Properly returning, destroying or otherwise disposing of nonpublic Company Information when it is no longer of use.
- Utilizing a "confidential" marking for nonpublic Company Information, and ensuring that this information retains its labeling when reproducing any portion of it.
- Keeping nonpublic Company Information in protected places (such as secured offices, locked drawers, and password-protected computer systems).
- Taking appropriate precautions when transmitting nonpublic Company Information, either within or outside the company. In general, we should ensure that nonpublic Company Information is not transmitted through unsecured e-mail, posted onto the Internet or sent to unattended fax machines.
- Promptly disclosing to management and the Legal Department any innovation (for example, technical development or improvement) developed on company time, using company resources or related to the business of Verizon to permit the company to protect it, and taking steps to prevent disclosure of these innovations outside of the company.
- Complying with any agreements regarding the use and protection of nonpublic Company Information owned by others. We are responsible for knowing what these agreements require of us.

(continued)

Nonpublic (Confidential or Proprietary) Company Information (continued)

- Only disclosing nonpublic Company Information according to agreed-upon terms, generally as outlined in non-disclosure agreements between the company and others, or according to directives from company representatives authorized to permit disclosure of nonpublic Company Information.
- Informing the Legal Department if we believe that any nonpublic Company Information has been or is being used or disclosed improperly.

Releases of and Requests for Nonpublic Company Information

We will only release nonpublic Company Information under the following conditions:

- To the public only when we are specifically authorized to do so. We should recognize that the company will lose trade secret protection for the nonpublic Company Information once it is made publicly available.
- To employees who have a legitimate, business-related need to know the nonpublic Company Information, and who have been advised of the applicable confidentiality requirements.
- To outside parties, whom we expect will treat the information appropriately, (for example, customers, suppliers, joint venture partners) to whom disclosure has been specifically authorized and who have entered into a written agreement to receive nonpublic Company Information under terms and conditions that restrict use and disclosure of the nonpublic Company Information.
- In such a way that we are assured of the security of that disclosure. For example, we will avoid sending nonpublic Company Information to unattended fax machines or across unsecured e-mail.

We never release nonpublic Company Information or information that could be perceived as nonpublic Company Information:

- In public Internet forums, such as in chat rooms or on electronic bulletin boards.
- To family, friends, former employees or any other parties that could potentially influence that person's investment decisions, including whether to buy, sell, or hold any stock or any other related financial instrument.

See Also: Insider Trading, p. 28

What is Company Information?, p. 29

- To selected parties (for example, shareholders or financial analysts) prior to the general public release of this information by the company.

When outside parties, such as the media, shareholders, financial analysts or outside attorneys request nonpublic Company Information, we will not respond to this request but will inform our manager and the Legal Department about the request and refer the requesting party to them.

Discussing Nonpublic Company Information

We will use caution when discussing nonpublic Company Information in public places (such as taxis, elevators, conferences, trade shows, restaurants) or on cellular/wireless phones.

Discussing Recently Released Nonpublic Company Information

We will not discuss nonpublic Company Information with outside parties for 24 hours after public disclosure unless specifically authorized. We will be mindful that even after public disclosure, certain nonpublic Company Information regarding an issue may still be nonpublic and should not be disclosed.

Employee Separation

When leaving the company's employment, we must understand our responsibilities to:

- Return any nonpublic Company Information in our possession.
- Not take any nonpublic Company Information or copies with us.
- Continue safeguarding nonpublic Company Information and not disclose it to or use it for the benefit of other parties, including future employers, without Verizon's specific prior written authorization.

Reporting Improper Disclosures and Use

We will report any improper disclosures or unauthorized use of nonpublic Company Information. Timely reporting of improper disclosures or unauthorized use can assist us in minimizing any damages, including informing certain parties of their duties to protect the nonpublic Company Information or taking other measures that protect our interests.

Nonpublic Information of Others**Acquiring Nonpublic Information of Others**

We will not accept nonpublic information belonging to a third party unless:

- The party is authorized to disclose this information to us or we have the owner's written permission to receive it, and
- The information is provided according to a written agreement with the owner or the authorized disclosing party, and which has been approved by our manager and the Legal Department.

See Also: Competitive Information, p. 52

We will ensure that new or prospective employees do not provide us with, and we do not use for our benefit, any nonpublic Company Information owned by third parties, and that we do not request such information from them, unless the third party owning the nonpublic Company Information has consented in writing to the disclosure and use of the information by Verizon.

Publicly Available Company Information

This includes publicly available company information protected by Verizon-owned patents, trademarks or copyrights.

Protecting Intellectual Property

To safeguard Verizon's intellectual property rights in certain publicly available Company Information, we will:

- Protect this information from illegal copying or other misuse by ensuring it is affixed with or identified by trademark, service mark or copyright symbols (using ®, TM, SM or "© Copyright [year the material was first publicly distributed] Verizon Communications Inc., All Rights Reserved"). This applies to any publicly available Company Information that Verizon would not want freely copied by third parties without Verizon's permission.
- Assist Verizon in obtaining copyright, trademark or other intellectual property protection for information that will be made publicly available.
- Assist Verizon in identifying situations where a third party is using a Verizon patented invention or Verizon trademark or copying Verizon copyrighted material, all without permission from Verizon.

If we are not sure whether Company Information requires protection, or what sort of protections are appropriate, we should contact the Legal Department.

Publicly Available Information of Others

This includes public information in which others have intellectual property rights, and that Verizon seeks to use, such as trademarks, trade names, service marks, patented technology, and certain copyrighted works.

Proper Use

We will comply with applicable laws and agreements (such as copyright laws and license agreements) that protect the intellectual property rights of others in publicly available information, including retaining all related notices on their publicly available information.

We are prohibited from improperly using intellectual property of others, including:

▪ **Trademarks**

- Selling or offering for sale products or services using trademarks, trade names, or service marks of others without appropriate written authorization.
- Using a name for a product or service that is confusingly similar to a trademark or service mark used by another for a similar product or service.

▪ **Patents**

- Making, using, or selling a product or service that is protected by another's patent without appropriate authorization.

▪ **Copyrights**

- Copying, distributing, displaying, performing, or modifying third-party copyrighted materials, documents, books, pictures, artwork, or software programs without authorization.

Note: A work may be protected by a copyright even if there is no copyright notice on the work.

QUESTION

Is it permissible to receive a third party's nonpublic information if I sign their non-disclosure agreement?

ANSWER

No. To minimize the risk that Verizon inappropriately acquires or uses nonpublic information of others, we should not accept others' nonpublic information without first obtaining approval from our manager and the Legal Department regarding the agreement which will govern the use and disclosure of this information. Non-disclosure agreements provided by a third party may not be signed without the prior approval of our manager and the Legal Department.

QUESTION

If my department hires someone to write a software program or take photographs for a company event, does Verizon own the work product?

ANSWER

Not necessarily. Unless ownership is specifically addressed in a written contract between Verizon and the provider, Verizon may not own the work product. We should ensure that these business arrangements are supported by a written contract approved by the Corporate Sourcing or Legal departments which addresses the ownership of intellectual property.

Integrity of Records

Maintaining the integrity of records is essential to meeting legal and regulatory obligations, as well as demonstrating how we conduct business with all our stakeholders. Therefore, each of us is responsible for the honesty of our records.

Working with Records

We will prepare company records completely, accurately and truthfully. We should apply the highest standards in accurately recording (or reconciling known) data discrepancies for each transaction to make correct and timely entries and postings so that all data elements mirror physical assets. We will not knowingly prepare, maintain or provide false or misleading records or data. We will not knowingly suppress relevant information in any company record or system.

We are also responsible for accurately reporting time worked and must accurately document expenses we actually incur according to Verizon policies.

See Also: Company Time, below

Direction by Others

No one may direct us to prepare or approve a false or misleading record.

Compliance with Standards

We are responsible for preparing records that comply with corporate policies, applicable laws of the U.S. and other countries, as well as accepted professional, regulatory and industry standards.

Retention

We will retain company records according to applicable laws and company policies.

Customer and Supplier Records

We will advise customers and suppliers of, and make prompt correction for, clerical or accounting errors as they become known.

Maintaining and/or Approving Records

When we are responsible for maintaining and/or approving any records, we will ensure that the recorded information is accurate and conforms to applicable standards and company policies.

Company Time

Efficient use and proper recording of work time ensures that we meet our obligations to each other, our shareholders and our business partners, and strengthens our competitive position in an increasingly challenging marketplace.

See Also: Gambling, p. 16

Outside Employment and Activities, p. 19

Political Activities and Contributions, p. 23

WHAT IS COMPANY TIME?

Company time is that time we spend on the job, including traveling on business, conducting business activities, or otherwise representing the company.

(continued)

*Company Time (continued)***Recording Time**

We will record our work time honestly, carefully, accurately and according to applicable laws.

Use of Time/Scheduling

We will use our work time productively and effectively. We will be on the job when scheduled and follow policies regarding work time schedules.

Personal Use of Time

We will not allow personal activities to inappropriately affect our use of company time. When recording time worked, we should not include time spent on personal activities.

Use of Co-Workers' Time

We will not ask fellow employees to use their work time for non-business purposes.

QUESTION

I suspect that one of my colleagues has been preparing false time sheets. What should I do?

ANSWER

You are obligated to disclose this concern to your manager, another manager, Verizon Security or the VZ Ethics Line. False time reporting is a serious problem and can even violate certain laws. (See **Reporting Ethics, Discrimination (EEO) and Compliance Concerns or Misconduct**, p. 5.)

Corporate Identity and Reputation

Our individual business dealings in the marketplace and with our communities are opportunities to reinforce our corporate identity and safeguard our good reputation. Therefore, it is critical that we ensure that our public perception is accurate and fair to the company by carefully managing how we present ourselves to those outside the company.

Use of Brand and Logo

We will use our Verizon corporate brand and logo strictly according to approved corporate identity specifications and protect these valuable assets from improper or unauthorized use. We will promptly report any misuse to the Corporate Brand Management and Legal departments.

External Communications

We will coordinate external communications with the Public Affairs and Communications Department and, if warranted, the Legal Department:

- To ensure that external communications accurately reflect the policies, positions and internal events of the company.
- Prior to giving speeches or submitting writings to outside publications on behalf of Verizon.
- Before using Verizon's name or our connection with the company in any external communications (for example, soliciting donations from fellow college alumni or using Verizon letterhead for outside activities not associated with or endorsed by Verizon).
- Prior to initiating or responding to media requests for comments or information about Verizon unless authorized.

*See Also: Endorsements, Testimonials and Personal Statements, p. 24
Use of E-Mail and the Internet, p. 38*

Community Relations

Verizon is committed to being a good citizen of the communities in which it does business and to observing the highest standards of business conduct in its relationships with the public. In supporting civic or charitable organizations or funding these organizations, we will comply with Verizon policies.

Sabotage and Espionage

Our operations must always be appropriately secured from sabotage and espionage so that our customers can rely on uninterrupted service and future service enhancements.

See Also: Sabotage, Espionage or Bribery, p. 49

WHAT IS PRONE TO SABOTAGE AND ESPIONAGE

Property prone to being sabotaged or information obtained through corporate espionage includes, but is not limited to, computer systems and passwords, security procedures, company facilities and their locations, circuit layout information, emergency re-routing and service restoration procedures, classified and national security information, technical and marketing research data, product development information, business plans, and marketing plans and strategies.

Access to Company Property and Company Information

We will only access company property and Company Information when authorized. We will provide access to nonpublic Company Information and sensitive equipment or property only to authorized persons. We will ensure that nonpublic Company Information and sensitive equipment and property are secured.

Computer and Network Security

We will comply with company policies regarding computer and network security and carefully guard against improper access.

*See Also: Communications and Computer Systems, p. 36
Virus Protection, p. 37*

Reporting

We will question any instances of unauthorized access to Company Information or property and contact Verizon Security as necessary.

Communications and Computer Systems

Verizon communications and computer systems are vital to our business and critical to global communications. Our success is directly related to safeguarding and properly using these systems.

WHAT ARE VERIZON COMMUNICATIONS AND COMPUTER SYSTEMS?

Verizon communications and computer systems are any equipment, hardware, software or networks owned, provided or used by or on behalf of Verizon that store or transmit voice or non-voice data. This includes telephones, cellular/wireless telephones, voice mail, computers, e-mail, facsimiles, pagers and company Intranet or Internet access (including when accessed through personal computers).

Note: When personal computers are used for company business, the company retains the right to access any company records or materials developed for company use. Also, we must ensure that any company materials are appropriately safeguarded according to applicable standards in this section, including, but not limited to, virus protection of, protected access to and backup of these materials.

Access, Maintenance and Protection

We will safeguard the confidentiality and integrity of company systems (including password logons, password-protected screensavers, access codes, network access information, log-on IDs) from improper access, alteration, destruction and disclosure. We will only access or use these systems when authorized. We will also abide by company standards contained in this section and other company policies regarding protecting data and information stored on these systems.

Unlawful and Inappropriate Use

We will never use company systems (such as the Intranet or Internet) to engage in activities that are unlawful, violate company policies or in ways that would:

- Be disruptive, cause offense to others, or harm morale.
- Be considered harassing or discriminatory or create a hostile work environment.

See Also: Harassment, p. 12
Threatening or Hostile Behavior, p. 17
Use of E-Mail and the Internet, p. 38

- Result in Verizon's liability, embarrassment or loss of reputation.

Protection and Integrity of Data

We will maintain the integrity of Company Information and data stored on company systems by:

- Only introducing accurate and truthful data into our systems that serves a legitimate business purpose.
- Only acquiring, using, altering, disposing of, or destroying data or information with proper authorization.
- Protecting data and information stored on or communicated across our systems and not accessing this data or information (for example, customer calls, employee records) unless authorized.
- Protecting data and information communicated over internal or public networks (for example, the Internet) to avoid compromising or disclosing nonpublic Company Information or communications.

Communicating Unauthorized Messages

We will not use Verizon systems to communicate inappropriate or unauthorized messages, data or information.

See Also: Use of E-Mail and the Internet, p. 38

Personal or Unauthorized Use

While company systems are intended for business purposes, limited personal use may be permissible when authorized by our manager and it does not:

- Interfere with our work responsibilities or business operations.
- Involve interests in personal outside business and/or other non-authorized organizations and activities (which may include, but is not limited to selling personal property/items or soliciting for or promoting commercial ventures, charitable, religious or political activities or causes).

See Also: Personal Solicitation for Outside Activities, p. 20

- Lead to inappropriate costs to the company.
- Violate any of the standards contained in this code or other Verizon policies.

See Also: Use of E-Mail and the Internet, p. 38

Establishment of Inappropriate Connections

We will never establish connections from operator positions, switching equipment or other test positions for personal or non-business use. We will not use any device or technique that manipulates or bypasses billing arrangements or regular circuit connections so as to give others unauthorized free or discount service.

Virus Protection

We will check all electronic media, such as software, diskettes, CD-ROMs and files for viruses when acquired through public networks (for example, the Internet) or from outside parties using virus detection programs prior to installation or use. If we suspect a virus, we will not use the applicable computer systems and equipment until the virus is removed and we will report the matter immediately to the appropriate network security contact.

Properly Licensed Software

We will only use approved and properly licensed software and will use it according to the applicable software owner's license agreements.

See Also: Publicly Available Information of Others, p. 32

Treatment of Third-Party Data or Software

We will ensure that any nonpublic Company Information or software of a third party that is stored, copied, or otherwise used on company systems is treated according to Verizon's standards regarding nonpublic Company Information and applicable agreements and intellectual property restrictions.

See Also: Nonpublic (Confidential or Proprietary) Company Information, p. 29
Nonpublic Information of Others, p. 31

(continued)

*Communications and Computer Systems (continued)***COMPANY MONITORING**

Company communications and computer systems, including, but not limited to, computer networks, data files, e-mail and voice mail, may be monitored and/or accessed by the company to ensure the integrity of the technology, protect against fraud and abuse, detect unauthorized access or use, and for other business purposes.

USE OF E-MAIL AND THE INTERNET

Inappropriate use of e-mail includes, but is not limited to, sending or forwarding:

- Messages, including jokes or any language, that may be considered discriminatory, harassing, unlawful, defamatory, obscene, offensive, insensitive or otherwise inappropriate (this includes but is not limited to, messages about age, race, gender, disability, sexual orientation, national origin or similar matters).

*See Also: Non-Discrimination, Equal Opportunity and Diversity, p. 12
Harassment, p. 12*

- Pornographic or sexually explicit materials.
- Chain letters.
- Information related to religious materials, activities or causes, including inspirational messages.
- Charitable solicitations unless sanctioned by Verizon.
- Gambling.
- Auction-related information or materials unless sanctioned by Verizon.
- Games or other software or copyrighted materials without a legitimate business purpose (and then only according to the rights and licenses granted by the owner of the games, software or copyrighted material).
- Messages that disparage other companies or products.
- Large personal files containing graphics materials or audio files (such as photographs and music).
- Materials related to personal commercial ventures or solicitations for personal gain (for example, messages that could be considered pyramid schemes).
- Information related to political materials, activities or causes unless sanctioned or permitted by Verizon.
- Unauthorized or inappropriate mass distribution of communication.
- Any other materials that would be improper under this code or other Verizon policies.

Inappropriate use of the Internet includes, but is not limited to, accessing, sending or forwarding information about, or downloading (from):

- Sexually explicit, harassing or pornographic sites.
- "Hate sites" or sites that can be considered offensive or insensitive.
- Auction or gambling sites.
- Non Verizon business-related chat sites.
- Underground or other security sites which contain malicious software and/or instructions for compromising Verizon security.
- Games, software, audio or other materials that we are not licensed or legally permitted to use or transmit or that are inappropriate to Verizon business.

USE OF E-MAIL AND THE INTERNET

- Offensive or insensitive materials, such as sexually or racially oriented topics.
- Any other materials that would be improper under this code or other Verizon policies.

Inappropriate use of the Internet also includes:

- Intentional importation of viruses.
- Registering Internet domain names of the Verizon business or those of third parties without authorization.

Note: In order to perform their job duties (for example, network monitoring), specific Verizon employees may receive management approval exempting them from certain of the above restrictions.

QUESTION

My friends and family occasionally communicate with each other over e-mail. Is it appropriate for me to use my Verizon computer to participate?

ANSWER

Generally, company systems are intended for business purposes. Limited, personal use of e-mail and the Internet may be allowed if approved by your manager and it conforms with company standards (see references below). Inappropriate use may overload Verizon's computer systems, tie up needed resources and damage Verizon's reputation.

*See Also: Personal Use of Company Property, p. 26
Communications and Computer Systems: Personal or Unauthorized Use, p. 37
Use of E-Mail and the Internet, p. 38*

Affiliate Transactions

While we benefit from the combination of organizations that make up Verizon, we want to ensure that our organizational structure is not used unfairly and that our business partners and Verizon all have a fair chance in the marketplace. We will abide by all federal and state laws and regulations, and company policies regarding transactions between and among Verizon companies (also called "affiliates"), especially transactions between Verizon incumbent local exchange companies and other Verizon companies.

Pricing of Inter-Company Transactions

We will ensure that permissible inter-company transactions are at a prescribed price level and appropriately documented to reflect this pricing.

Inter-Company Charges

We will accurately report and document time and expense charges related to inter-company transactions.

Joint Marketing

We will only conduct joint marketing activities among affiliates when permitted by federal and state laws and regulations.

Sharing Resources and Company Information

We will only share resources and Company Information, including Customer Proprietary Network Information (CPNI), among Verizon affiliates with respect to marketing, sales and telecommunications products and services when permitted by applicable laws, regulations, agreements with third parties and company policies.

See Also: Customer Marketing, p. 41

Connecting with Company Assets

Connecting with Customers

Our customers expect fair, honest and respectful treatment from us, especially in how we use and protect their information and communications.

FAIR COMPETITION STANDARDS

If our job involves working with customers, we should be familiar with relevant standards that ensure we compete in the marketplace fairly while interacting with potential and current customers.

See Also: Connecting Fairly in the Marketplace, p. 49

Privacy of Customer Information and Communications

Maintaining the privacy of our customers' information and their voice and non-voice communications is a serious responsibility and a service they expect.

See Also: Company Information, p. 28

VERIZON PRIVACY PRINCIPLES

Verizon has adopted ten "Privacy Principles" which reflect the company's commitment to safeguarding customer privacy in an era of rapidly changing communications technology and applications. We should be aware of the Principles and how they may impact our jobs.

General Privacy Principles

1. Verizon obtains and uses individual customer information for business purposes only.
2. Verizon informs customers how information Verizon obtains about them is used, as well as their options regarding its use.
3. Verizon gives customers opportunities to control how and if Verizon uses individual information about them to sell them products and services.
4. Verizon enables customers to control how and if Verizon discloses individual information about them to other persons or entities – except as required by law or to protect the safety of customers, employees or property.
5. Verizon strives to ensure that the information Verizon obtains and uses about customers is accurate.
6. Verizon considers privacy implications as new services are planned and introduced and informs customers of the privacy implications of these services.
7. All Verizon employees are responsible for safeguarding individual customer communications and information.
8. Verizon participates in and supports consumer, government and industry efforts to identify and resolve privacy issues.
9. Verizon complies with all applicable privacy laws and regulations wherever Verizon does business.
10. Each Verizon company is responsible for implementing these Principles and informing customers about its privacy practices. Verizon encourages companies related to, but not wholly owned by, Verizon to adopt these Principles.

Customer Communications

We will maintain customer privacy and not – nor allow others to – access, listen to, eavesdrop on, monitor, record, tamper with or intrude upon any customer conversation or non-voice communication, or divulge their existence, except in response to a verified service or installation order, or to comply with a valid legal order. We will also safeguard these transmissions from unauthorized access, use, theft or sabotage.

Protecting Customer Information

We will not use or access records related to customer information, including our own and those of our families, friends, or co-workers or former employees, except when authorized and with a valid business purpose. We will only disclose this information to authorized Verizon employees with a valid business purpose or to comply with a legal order. Customer information includes information about customers' communications or information-processing arrangements, such as unlisted telephone numbers, billing records, and network information and equipment.

Customer Marketing

We will abide by Verizon policies and applicable laws and regulations that give customers opportunities to control whether and how Verizon:

- Uses their information to market additional products and services to them, or
- Provides this information to other companies for marketing.

When our customers are also telecommunications carriers or resellers of telecommunications, we will not use their subscriber information, orders or processes/services to aid in our marketing or sales efforts.

Disclosure of a Court Order

We will neither confirm nor deny to customers or to any unauthorized person the existence of, or any information concerning, a subpoena, warrant or court order for communications, wiretaps and/or records, unless authorized by law. We should immediately refer any requests of this kind to Verizon Security.

QUESTION

Because I work for Verizon, sometimes my family or friends ask me to get someone else's telephone number or address for them. Is this appropriate?

ANSWER

No. You should never use your job with Verizon to obtain information that isn't available to the public. If public, your family or friends should obtain this information through directory assistance. If nonpublic, this information is only accessible to employees for business reasons.

Connecting with Suppliers

We value our suppliers because they contribute to our overall success. We ensure that we receive fair and competitive prices and quality services by maintaining our objectivity when selecting suppliers and by building relationships based upon integrity and trust.

FAIR COMPETITION STANDARDS

In addition to the following standards, our relations with potential and current suppliers involve numerous issues related to fair competition. If our job involves working with suppliers, we must be familiar with relevant standards that ensure we compete in the marketplace fairly while interacting with potential and current suppliers.

See Also: Connecting Fairly in the Marketplace, p. 49

Working with Agents, External Consultants, Contractors and Other Representatives

We hire special suppliers, such as agents, external consultants, on-site contractors, and other representatives to provide specific services for the company. Our relations with these business partners must meet our standards regarding hiring and working with suppliers. In short, we will:

- Use a selection process that is fair and does not improperly discriminate.
- Ensure these parties are apprised of their obligation to abide by Verizon's standards of business conduct.
- Put in writing the nature of our relationship with these business partners and have agreements approved by the Corporate Sourcing and Legal departments.

Selecting Suppliers

The basic principle is to select the supplier best able to meet Verizon's needs. Suppliers should be selected on the basis of objective information concerning such factors as value (quality for price), best or lowest price, technical excellence, service reputation, production and capacity.

Supplier Selection

We will select suppliers in a fair and ethical manner and always on the basis of legitimate business interests. We should:

- Review and follow company procurement and related policies and seek appropriate guidance prior to selecting a supplier.
- Select suppliers based on clear criteria relevant to business needs, including price, product and service quality, delivery, reliability, value and reputation for ethical conduct and health, safety, environmental and other legitimate business considerations.
- Support company programs that seek bids and proposals from qualified suppliers, including minority-owned and women-owned companies and local suppliers.
- Comply with any agreements or contractual provisions made with potential suppliers during the selection process, such as safeguarding their nonpublic information and not disclosing bid information.
- Not manipulate procurement criteria to favor a particular supplier in order to steer business to them.
- Not inappropriately base our selection on improper or unlawful discrimination characteristics.

See Also: Non-Discrimination, Equal Opportunity and Diversity, p. 12

Supplier Compliance

Suppliers who do business with Verizon may be required to provide certification of compliance with various laws and standards. We will ensure that suppliers have appropriate certifications before awarding business to them.

Discriminatory Discounts/Prices

We will not request or accept discriminatory discounts or prices which do not represent a fair market value for goods or services of similar quality and quantity without consulting with the Legal Department.

Intention of Commitment

We will never say or write anything that a potential supplier may interpret as a commitment to do business unless that is our specific intention.

See Also: Endorsements, Testimonials and Personal Statements, p. 24
Purchasing from Former Employees, p. 25
Connecting through Business Courtesies, p. 44

Working with Current Suppliers**Business Courtesies and Discounts**

We will follow Verizon guidelines concerning gifts, gratuities, entertainment, and other considerations of value. We will not accept any considerations or incentives, no matter how small, or allow ourselves to participate in any activity, such as a sponsored conference, social event or sporting activity, if doing so may improperly influence or appear to influence our business judgment.

See Also: Connecting through Business Courtesies, p. 44

Treatment of Supplier Information

We will treat current and potential supplier information respectfully and with proper consideration for the supplier's and Verizon's needs. We will never reveal nonpublic information about one supplier to another supplier – including suppliers already affiliated with Verizon – or to anyone outside of Verizon without appropriate authorization.

See Also: Company Information, p. 28

Conflicts of Interests

If we work with suppliers, we will avoid any conflicts of interests and may not accept any compensation from a supplier, except through a program approved and administered by Verizon.

See Also: Connecting without Conflicts of Interests, p. 19
Customer and Supplier Records, p. 33

Connecting through Business Courtesies

The occasional exchange of business courtesies such as modest gifts and reasonable entertainment can help facilitate our efforts to build strong and trusting relationships with customers, suppliers, and others. However, we cannot allow these courtesies to adversely affect our objectivity and decision-making, nor should we use these practices to place undue influence on our business partners.

See Also: Connecting with the U.S. Government: Business Courtesies, p. 56
Connecting Internationally: Business Courtesies, p. 60
Business Courtesies and Discounts, p. 43

General

We should never offer, accept, give or pay for gifts, entertainment, travel or any other consideration of value if doing so may improperly influence or appear to influence others' or our own objective business decisions. If we use good judgment and act with moderation, the occasional exchange of modest gifts and reasonable entertainment may be appropriate. Offering or accepting gratuities is never appropriate, and may constitute a civil or criminal offense.

Soliciting Courtesies

We will never solicit for ourselves, or on behalf of others, entertainment, gifts, gratuities, charitable or other donations from anyone with whom we do business.

Courtesies and Purchasing

When we are involved in any stage of a procurement process, we are prohibited from accepting any entertainment, gift or gratuity if doing so may improperly influence or appear to influence our procurement decisions.

Others' Standards

We will know our customers' policies concerning their acceptance of business courtesies and ensure our offers do not compromise their standards.

Communicating Standards to Others

We are responsible for communicating our standards regarding business courtesies to our suppliers, customers and other business partners.

Adherence to Standards

We will never give or accept anything of value, such as gifts, entertainment, travel and other considerations, unless it is legal in the local jurisdiction and acceptable under Verizon standards and policies.

Considerations to Family Members

Business courtesies provided by Verizon business partners to our family or household members because of their relation to us are considered business courtesies given directly to us. We will follow Verizon standards regarding such business courtesies.

Business Unit Policies

We will know and abide by our specific business unit policies on exchanging business courtesies if those policies are more stringent than Verizon standards.

Use of Personal Assets

We will not use our personal assets to provide a gift, entertainment, gratuity or other consideration to a customer, supplier, or other business partner that company standards do not permit.

Gifts

We will only give or accept gifts that promote goodwill with our business partners and do not improperly influence or appear to influence others' or our decisions and actions.

Appropriate Gifts

In general, we may only accept a business-related gift that is not cash or could be used like cash (for example, a gift certificate or coupon are not acceptable) and is of moderate value, whether from a person or organization seeking or having a business relationship with Verizon or with interests that could be substantially affected by Verizon's actions. In addition, a gift is more likely to be appropriate to accept if it is promotional in nature and distributed widely.

In situations when giving or receiving gifts of greater than moderate value may be appropriate, our director-level or above manager's approval is required. Factors to be considered in granting approval may include the following:

- The gift is disclosed, and
- There is no reasonable likelihood that the gift will improperly influence others' or our decisions and actions.

See Also: Preferential Securities Ownership, p. 21
Examples of Acceptable Gifts, p. 46

Discounts

We will only accept a customer or supplier discount or other preferential treatment if approved and widely available to Verizon employees.

Returning Gifts

We will politely return gifts that exceed Verizon standards with an explanation that company standards do not permit us to accept such gifts. When returning a perishable item that exceeds our standards is not feasible, it should be anonymously donated to charity. If this is not feasible, the gift should be accepted on behalf of Verizon, not the individual, and shared among all employees in the office (for example, flowers, fruit baskets). If shared, the gift's value per person should be moderate.

Exchanging Gifts with Business Friends

When we establish friendships with customers, suppliers and other business partners that continue outside of business, we will ensure that any gifts we exchange with these friends do not improperly influence or appear to influence their or our business decisions. We will discuss with our manager when exchanging gifts falls outside company standards.

(continued)

*Gifts (continued)***EXAMPLES OF ACCEPTABLE GIFTS**

Including, but not limited to:

- Non-cash or anything that could be used like cash.

Note: *Gift certificates and coupons are not acceptable.*

- Moderate in value (defined as less than \$75 per calendar year from the same company).
- Promotional in nature and imprinted with a company logo (for example, pens, hats with logos, t-shirts).
- Distributed widely (for example, to other employees, to the supplier's other customers).

For specific guidance on gift exchanges, see **Appropriate Gifts** preceding these examples.

Note: *Government rules regarding business gifts may be more stringent.*

See Also: *Connecting with the U.S. Government: Business Courtesies, p. 56*
Connecting Internationally: Business Courtesies, p. 60

Entertainment

We will only offer or accept entertainment that is appropriate, reasonable, is offered or accepted in the normal course of an existing business relationship, and does not improperly influence or appear to influence our decisions and actions or those of our business partners.

We may provide or accept reasonable business meals or entertainment, including attendance at sporting or cultural events, as long as the meal or entertainment is associated with an occasion when business is discussed, and is provided as a normal part of business. We will obtain prior approval from our manager before accepting or offering entertainment.

To avoid any real or perceived obligation, it would be appropriate to reciprocate with similar modest hospitality in the course of an existing business relationship.

See Also: *Courtesies and Purchasing, p. 44*

EXAMPLES OF ACCEPTABLE ENTERTAINMENT

Including, but not limited to, appropriate, reasonable hospitality such as:

- Meals.
- Charity events.
- Local sporting events.
- Holiday gatherings or other celebrations.
- Plays, concerts or other cultural events.

Note: Government rules regarding business entertainment may be more stringent.

See Also: *Connecting with the U.S. Government: Business Courtesies, p. 56*
Connecting with Suppliers: Business Courtesies and Discounts, p. 43
Connecting Internationally: Business Courtesies, p. 60

QUESTION

A vendor has offered me tickets to a baseball game. Can I accept them?

ANSWER

Possibly. If the vendor is inviting you to attend the game with her, this may constitute a business function and may be appropriate if it is within Verizon standards and with your manager's authorization. If the vendor is not attending, then the tickets would be considered a gift and must conform to Verizon's standards for accepting gifts.

Gratuities

(Including Bribes and Kickbacks)

We will never request, accept or offer any gratuities or other payments for providing specific services. This includes accepting any gratuities from customers who may wish to thank us for the services we provide. Also, we will not inadvertently suggest that we would accept such gratuities. Payments or favors may be considered bribery or kickbacks, which violate Verizon policies, as well as U.S. laws and the laws of other countries.

See Also: Returning Gifts, p. 45

Facilitating Payments, p. 58

Connecting with the U.S. Government: Improper Influence, p. 56

WHAT ARE GRATUITIES?

Gratuities – Gratuities include cash or other tips offered in appreciation for *providing specific services*. Gratuities can include, but are not limited to:

- Money or other items of value (for example, a gift certificate, box of candy, bottle of wine).
- Loans.
- Special privileges.
- Personal favors.
- Benefits.
- Services.
- Payments or favors that may be considered a bribe or kickback.

WHAT ARE BRIBES AND KICKBACKS?

Bribes – Bribes are payments or other compensation that are: a) designed to influence a recipient's business judgment (for example, to purchase a product or service), or b) non-customary, unreasonable, above Verizon limits, or otherwise perceived as sufficient to influence the recipient's business judgment.

Kickbacks – Kickbacks are expected payments or other compensation that serve as an unofficial "thank you" or benefit for the recipient having performed a business service.

QUESTION

I have been offered a \$10 tip from a customer for services I provided to them as a Verizon employee for a difficult job I just completed. I do not want to insult the customer by turning the tip down. Can I accept?

ANSWER

No. If a customer offers you money, or any other form of tip, you should politely decline it and explain it is against Verizon's policies for you to accept it.

Connecting Fairly in the Marketplace

We are committed to vigorous and lawful competition that is based upon the merits of our products and services and good name. At the same time, Verizon's activities are governed by fair competition laws and regulations. We seek to maintain the trust of our business partners by competing fairly.

NOTE

Certain industry regulations may conflict with fair competition laws. Whenever we believe a conflict exists, we are responsible for seeking advice from the Legal Department before taking any action that might violate either the applicable regulatory directives or the fair competition laws. In addition, issues regarding fair competition are complex. We should consult with the Legal Department before getting involved in any such issues or when we need clarification regarding related laws and regulations.

Dealing with Competitors, Customers and Suppliers

Our relations with competitors, customers and suppliers can cause or lead to the appearance of inappropriate relations that limit competition.

Market Allocation

We will not directly or indirectly discuss, agree or contract with competitors to allocate markets, divide up customers or otherwise restrict competition.

Sabotage, Espionage or Bribery

We will not engage in sabotage, industrial espionage or bribery with regard to competitors or potential competitors.

See Also: Sabotage and Espionage, p. 35

What are Bribes and Kickbacks?, p. 48

Bid Rigging

We will not collude with other companies to set the terms or outcome of a bidding process for customer services.

Industry Discussions/Exchange of Information

We will not participate in any discussion with competitors that could be perceived as limiting competition or exchanging information that could limit competition. This may include:

- Pricing information.
- Bid-related information.
- Trade information.
- Information related to setting unnecessarily strict industry standards that exclude nonmembers.
- Agreements that limit fair competition.

Prior to engaging in any discussions with competitors regarding industry issues, we are responsible for learning the standards regarding these discussions.

See Also: Company Information, p. 28

Price Discrimination

We will not offer prices to certain customers that are not supported by legitimate business conditions, such as volume, inventory, or product obsolescence.

(continued)

*Dealing with Competitors, Customers and Suppliers (continued)***Reciprocal Dealing**

- We will not require customers or suppliers to trade with Verizon or its affiliates as a condition for Verizon or its affiliates to trade with them. In addition, we should reject any reciprocal agreement with a supplier that restrains or appears to restrain competition.
- We will not make information about the company's purchases available to our marketing department which could inadvertently base its marketing decisions on whether a company has sold to or bought from us.
- When trying to gain or hold a customer, we will not mention the fact that Verizon buys from that customer.
- We will not suggest that our or our employees' personal business decisions will be based on a customer's or supplier's reciprocal relations with Verizon.

Tying Arrangements

We will not require, coerce, or otherwise suggest that customers must buy one product or service in order to be able to buy an additional product or service, unless one product or service requires another to function effectively. In such cases, we will ensure that these conditional sales are specifically authorized.

Exclusive Dealing

We will not unfairly require a customer or supplier to trade only with us and not with a competitor.

Intellectual Property

We will not become involved in assigning, licensing, or applying for patents, copyrights, trademarks or other intellectual property with customers or suppliers that could unfairly limit competition.

Price Fixing

We will not directly, or indirectly, agree, contract with, discuss, or otherwise exchange information with competitors, customers, suppliers or others outside Verizon regarding establishing, maintaining, or changing prices in concert with others.

Boycotts, Refusals to Deal and Terminations

We will not enter into any arrangement with a company not to deal with another company, such as a price-cutting distributor or a supplier who also competes with us, without specific authorization.

Joint Ventures or "Teaming"

We will not submit a joint bid, enter into a joint venture, or "team" with another non-Verizon company without authorization.

QUESTION

I have established good relations with the account executives of some of our competitors. At trade shows and conferences we often catch up on industry trends, customer deals, etc. Is this appropriate?

ANSWER

You should use caution in these situations and not discuss the price or terms of any Verizon contracts or gain competitive information directly from a competitor. You should not even joke about inappropriate topics, such as dividing up sales territories, since this could be misinterpreted. You should refuse to discuss any anti-competitive issues and leave such conversations immediately.

Attempts to Monopolize

Our independent actions regarding customers, suppliers, competitors and others can unfairly restrain trade and lead others to perceive that we are attempting to gain market share in an inappropriate manner.

Customer, Supplier or Competitor Discrimination

- We will not refuse to deal with or supply, provide or stop providing services to others simply because they are competitors, purchasing from competitors, or are currently supplying to, or may in the future supply to, competitors.
- We will not discriminate against or improperly exclude customers or competitors, in any way, in providing access to network services.
- We will not give preference to one competitor over another in quality, testing, installation and maintenance of regulated common carrier services.

Marketing Company Products and Services

We will not be inaccurate, untruthful, incomplete or make unsubstantiated comments when representing the quality, performance, features and availability of our products and services in conversations, advertising and other public communications.

Unhooking Practices

- We will not interfere with any relationship between one of our competitors and their prospective or actual customers or suppliers, whether or not this involves one of our prospective or actual customers or suppliers, including causing someone to breach a contract or order.
- Where our customer conducts business with a competitor, we will continue to provide the same level of quality service with any other products we supply the customer.

Predatory Practices

We will not engage in any activity that can be perceived as "predatory", such as targeting our marketing efforts at one individual or select group of competitors to drive them out of business or unfairly limiting competitors' ability to access supply sources.

Predatory Pricing

We will not engage in predatory pricing practices, such as pricing products or services at unreasonably low prices or below their actual cost in order to drive out competitors.

Resale Price Maintenance

We will not try to establish the price that resellers or distributors charge for our products.

Competitor Disparagement

We will promote our products and services through fair and accurate comparisons with our competitors and sell on the strength of our products and services and our company's reputation. Specifically, we will:

- Not engage in unfair, misleading or inaccurate comparisons with our competitors' products and services.
- Not make claims about a competitor's products or services unless the claims are relevant to the quality of competing products and services and based on the competitor's current published materials or other factual data.

(continued)

Competitive Disparagement (continued)

- Not comment on the character, financial condition, or potential legal or regulatory problems of competitors.
- Not make negative remarks about entire groups of competitors and their products and services.

Competitive Information

While it is entirely proper for us to gather competitive information, we want to compete fairly and to avoid even the appearance of improperly acquiring this information.

Appropriate Sources

We will collect competitive information from:

- Public sources (for example, published articles, advertisements, public filings and other public communication).
- Industry gatherings (for example, trade shows, conferences, other industry events).

See Also: Industry Discussions/Exchange of Information, p. 49

- Benchmarking/competitive research (as long as the information gathered is made public to customers and in doing so we do not misrepresent ourselves).
- Industry surveys by reputable external consultants.
- Sources available to customers and the general public.
- Appropriate dealings with customers.

See Also: Nonpublic Information from a Business Partner-Competitor, p. 53
Publicly Available Information of Others, p. 32
Nonpublic Information of Others, p. 31

If we have reason to believe that competitive information from customers or others may not be public, we should consult with the Legal Department before accepting or using this information.

Representing Ourselves

We will accurately represent ourselves and never misrepresent our identity when gathering competitive information. We will ensure outside entities that we work with or employ accurately represent themselves when seeking competitive information on the company's behalf.

Information from Competitors

We will refrain from exchanging information with competitors unless we are well briefed on what can and cannot be discussed. For instance, we should never accept nonpublic marketing or pricing information directly from a competitor.

See Also: Company Information, p. 28

To further safeguard against getting improper information from competitors:

- We will not hire an employee from our competitors in order to obtain the competitor's nonpublic information.
- We will not accept a competitor's nonpublic information from a Verizon employee who previously worked for a competitor.
- If we supervise employees, we are responsible for informing these employees not to bring nonpublic information from a previous employer to Verizon nor use this information in their work at Verizon.
- We should never encourage an employee to violate any non-disclosure or confidentiality agreements he or she has with a former employer.

Acquisition and Use of Nonpublic Information

We will never attempt to acquire a competitor's trade secrets or other nonpublic information through unlawful means, such as theft, spying or breach of a competitor's non-disclosure agreement by a customer or other party.

See Also: Acquiring Nonpublic Information of Others, p. 31
Company Information, p. 28

Nonpublic Information from a Business Partner-Competitor

We will use nonpublic information obtained from a business partner for the benefit of that business partner according to our agreement with them. We may not use this information for any other purpose.

Connecting with the U.S. Government

In our relations with U.S. federal, state and local governments – all vital business partners – we want to carefully safeguard their nonpublic information and other assets, avoid even the appearance of impropriety in our dealings, effectively respond to their information requests, and maintain proper business relations. In addition, detailed laws and regulations govern virtually every aspect of our dealings with U.S. federal, state and local governments and their agencies, including contracting to the federal government.

NOTE

Since issues regarding business with the U.S. Government can be complex, we should consult with the Legal Department before getting involved in any such issues or when we need clarification regarding related laws and regulations.

See Also: Connecting Internationally, p. 57

General

Compliance with Laws and Regulations

We will comply with the highest standards of honesty and integrity in our relations with government officials and employees. We are responsible for knowing the ground rules, whether codified or not, of all government interactions, including federal, state and local laws and regulations as well as those of governments in other countries. If we are doing specific business with a government agency, we will comply with that agency's specific rules and any related laws and regulations.

The Government as Customer

Contracting-Related Standards

If Verizon is a potential or actual supplier on a contract with the government or to a government contractor, we will obtain from the Legal Department any additional information needed to comply with applicable laws, regulations and procedures.

Supplier/Contractor Compliance

We should ensure that any parties we employ on government contracts, including suppliers, external consultants, contractors, subcontractors, or others, agree in writing to abide by the specific rules related to the government contract.

Document Preparation

We will ensure that documents we prepare are accurate and will be clearly understood if they are ever publicly disseminated or involved in a government proceeding.

Requests for Additional Data

We will respond to government requests for relevant data and/or reformulate Verizon's existing data, as requested, if doing so is appropriate and can be accomplished without significant effort or undue cost.

Meeting Locations

We will meet with government employees or officials in government offices unless otherwise specified by the official and will do so according to the guidelines pertaining to the level and branch of government.

Servicing Government Contracts

In servicing government contracts, we will:

- Ensure that charges to government contracts are accurate and that we do not shift costs among contracts without authorization.
- Not deviate from contract requirements by substituting unauthorized products or services.
- Perform required tests and inspections unless properly waived.

Information Supplied to the Government

We will ensure that information we supply to a government, including reports, certifications, claims or statements, is accurate and complete and cannot reasonably be perceived as misleading, misrepresenting or misstating the information. If we discover any misrepresentation, misstatement, misunderstanding, material omission or other mistake, we will immediately disclose the mistake and remedy the situation.

Nonpublic Information

We will not request or obtain nonpublic information which we are not authorized to receive, including competitive information, source selection criteria or agency reports or studies. We will also ensure that any external consultants and other business partners under our direction also understand the rules for not requesting or obtaining nonpublic information which we or they are not authorized to receive.

Agency-Specific Rules

If we are doing business with a government agency, we must comply with that agency's specific rules and any related laws and regulations.

Other Government Relations**Recruiting Current or Former Government Employees**

We will comply with any legal requirements regarding recruiting current or former government employees as Verizon employees, consultants or other business partners, or even discussing such arrangements with them.

Regulatory Commissions

We will comply with all federal and state rules, regulations and tariffs. We will provide truthful and accurate testimony and data responses in regulatory and court proceedings.

See Also: Our Individual Responsibilities, p. 2
The Government as Customer, p. 54

Business Courtesies

(Government Business)

Exchange of Courtesies

We will not offer, request, provide or accept business courtesies other than those that are strictly within the rules of the specific government or government agency, and will also meet Verizon's standards contained in this code. Business courtesies may include, but are not limited to, gifts, travel, meals, refreshments and entertainment. In most instances, we are not allowed to offer or provide business courtesies and other considerations to U.S. federal, state and local government employees.

When working with other companies on a government contract, we will comply with applicable government rules related to exchanging business courtesies.

See Also: Connecting through Business Courtesies, p. 44

Improper Influence

We will not authorize, offer or provide any direct or indirect payments, business courtesies or preferential treatment to any government employee or their family members to receive favorable business treatment or to improperly influence the employee.

U.S. Government Classified and National Security Information

The U.S. Espionage Act and other regulations govern our work with U.S. classified and national security information and impose stringent penalties for misuse of this information.

Safeguarding Information and Assets

We will protect U.S. Government classified and national security information by:

- Ensuring that access to this information is restricted only to employees with proper clearance and a "need to know".
- Safeguarding this information and other assets related to national defense from others, whether such items are classified or unclassified.
- Coordinating all activities related to this information, such as proper clearance and contracts, with Verizon Security.

Departing and Former Employees

When leaving or retiring from the company we will:

- Ensure that all documents and records in our possession containing U.S. classified or national security information are returned to the company.
- Continue safeguarding U.S. classified or national security information after our employment with the company ends.

See Also: Departing and Former Employees, p. 25

Connecting Internationally

Internationally, we are committed to conducting business on behalf of Verizon in a manner that is consistent with Verizon's values, principles and high ethical standards. We will comply with all U.S. regulations and restrictions in dealing with other countries, as well as applicable laws and restrictions of countries outside the U.S.

NOTE

If our job involves working internationally, we must be familiar with relevant standards that ensure we compete in the marketplace fairly while interacting with international businesses.

See Also: Connecting Fairly in the Marketplace, p. 49

Issues regarding international business are complex. We should contact the Legal Department before getting involved in such issues or when we need clarification regarding related laws and regulations.

All standards in this code relate to business we conduct throughout the world. Some issues are more sensitive in certain international locations and should be referenced as appropriate.

See Also: Health and Safety, p. 16
Environmental Protection, p. 18
Political Activities and Contributions, p. 23
Connecting with Company Assets, p. 26
Connecting through Business Courtesies, p. 44
Connecting Fairly in the Marketplace, p. 49

General

Adherence to U.S. and Non-U.S. Laws

We will observe the U.S. and non-U.S. laws and regulations that apply to our international business. This includes knowing all local laws and regulations in the countries and provinces where we do business and that are relevant to our operations.

Travel Documents

We will know and conform to standards regarding acquisition and use of travel documents regarding business travel outside the U.S., including passports, visas, approvals and special documentation. As a matter of personal safety, the company advises employees not to travel to dangerous locations or to countries in which the company will not do business due to security reasons.

Working with Agents and Other Business Partners

We will comply with laws, regulations and Verizon policies in employing or working with agents, external marketing consultants and other business partners regarding written agreements and contracts, commissions, payments, maintenance of records and related approval and reporting requirements.

See Also: Connecting with Suppliers, p. 42

Business with Government Officials or Their Family Members

In some parts of the world there may be little alternative but to establish a legitimate business relationship with a government official or that official's family member outside of their official capacity. We are responsible for following company standards, local laws and U.S. laws regarding doing business with officials of governments outside the U.S. or their family members.

(continued)

*General (continued)***Review of International Risk Areas**

We will contact Verizon Security and/or the Legal Department for guidance related to specific risk areas around the world prior to initiating contracts, working on documents, or handling any other form of business related to these countries.

Import/Export Control

It is our policy to comply with the U.S. and other countries' import and export laws and regulations. Not doing so could result in the loss or restriction of Verizon's export privileges, which in turn could damage or even destroy a significant portion of our business.

Exporting

We will obtain appropriate authorization and/or licensing before:

- Exporting any product, service, or technical information from the U.S. or moving it between or among countries. (Technical information can consist of manufacturing processes, product use or commercial and technical know-how, data or software.)
- Providing any product, service or technical information to parties that previously have been denied an export license.
- Discussing with or displaying to non-U.S. nationals any Verizon technical data, equipment or nonpublic information or its application, whether in the U.S. or abroad, either on company or personal business.
- Discussing or displaying any Verizon technical data, equipment or nonpublic information or its application while abroad, either on company or personal business.

We will determine with the Legal Department situations that may require written assurance by non-U.S. recipients that they will abide by U.S. export control regulations.

Payments Outside the U.S.

Our international business payments must be fair and proper, directed to appropriate business partners and according to laws of the U.S. and other countries in which we do business.

Direct Payments

We, and/or our agent acting for Verizon, will never authorize or provide payments, related offers, or any other benefit to improperly influence an official outside the U.S. or other person's decision-making to secure, retain, or direct business. Doing so could constitute a violation of U.S. and other countries' laws and Verizon standards.

Third-Party Payments

We will never make payments to a third party that we suspect may be passed through an intermediary to officials outside the U.S. or other persons to improperly secure, retain or direct business. We must be able to clearly track the final destination of any funds used on our behalf to ensure they do not go toward any improper payments.

Facilitating Payments

We will comply with Verizon policies, including obtaining prior approvals, as necessary, regarding making any payments to expedite routine government actions (for example, obtaining utility services or visas, clearing customs).

Payments to Contractors

Unless authorized by the Legal Department, we will only make payments to contracting parties:

- In their name.
- To their principal place of business within their country.
- In the local currency of their country.

We must not honor requests by parties outside the U.S. to:

- Increase or decrease agreed amounts on any invoice when such a request is contrary to our standards, procedures or applicable laws.
- Submit multiple invoices when we suspect such invoices may be contrary to our standards, procedures or applicable laws or otherwise used improperly.

We will ensure that percentages of commissions paid are reasonable and customary and do not exceed the legal limits in the locality where they are paid.

Record Keeping Requirements

We will comply with U.S. laws and company policies regarding:

- Meeting specific record keeping requirements.
- Making appropriate disclosures regarding commission payments.

International Boycotts and Other Economic Sanctions

U.S. standards regarding international boycotts promote U.S. security, trade and human rights interests.

Improper Country Boycotts

We will not participate on Verizon's behalf in boycotts of countries, their nationals or blacklisted companies, unless these boycotts are sanctioned by the U.S. and approved by the Legal Department.

Requested Information Related to Boycotts

Unless approved by the Legal Department, we will not furnish information about:

- Verizon's past, present or prospective business relationships with boycotted countries or blacklisted companies.
- Any person's: a) race, religion, gender, national origin or nationality, b) membership in or support of a charitable or fraternal organization supporting boycotted countries, c) relationship with nationals of boycotted countries, or d) relationship with a boycotted country or blacklisted company.
- Any person believed to be restricted from doing business with a boycotted country.

We will contact the Legal Department immediately if we receive any request for information considered boycott-related or any request to comply with other statements referring to boycott compliance.

Contractual Conditions or Requirements

We will never pay, honor, confirm or implement letters of credit, financial documents or bills of lading, or agree to contractual provisions containing any conditions or requirements contrary to the anti-boycott regulations.

Business Courtesies

(International Business)

In countries or cultures outside of the U.S., customs vary regarding exchanging business courtesies. We will ensure that any exchange of business courtesies when conducting business conforms to U.S. and local laws and Verizon standards.

Exchanging Gifts with Officials Outside the U.S.

We will report any gifts we receive that fall outside of Verizon standards to the VZ Ethics Line for appropriate documentation, safeguarding and disposition by the company. We will seek prior approval from the Legal Department before providing any gifts that fall outside Verizon standards.

See Also: Connecting through Business Courtesies, p. 44
Gratuities, p. 48
Payments Outside the U.S., p. 58

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